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RCC COMPLIANCE CONSULTING

PAIA Manual

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1. INTRODUCTION

This PAIA Manual has been prepared by RCC Compliance Consulting to outline the procedures and principles governing access to information held by the organisation. As a professional compliance practice specialising in FAIS, FICA, POPIA, governance frameworks, competency requirements, training, and risk management, RCC Compliance Consulting recognises the importance of transparency and accountability in its operations. This Manual explains the process through which stakeholders may request access to records, while ensuring that the company upholds its legal obligation to protect personal and confidential information. It reflects the organisation's commitment to ethical governance, openness, and compliance with PAIA, POPIA, and all applicable regulatory requirements.

2. COMPANY DETAILS

Name of Organisation: RCC Compliance Consulting

Physical Address: GM Building, 1st Floor Cnr Cradock and Warren Rd, Lyttleton Manor, Centurion, 0157

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Website: www.rccaudit.co.za

Information Officer: Matsheketsheke Thanzi

Deputy Information Officer: TBA

RCC Compliance Consulting is a professional compliance practice offering specialised regulatory and training support primarily to Financial Services Providers (FSPs) and Accountable Institutions. The organisation handles various categories of information in the course of delivering services, and this Manual aims to ensure responsible access to such information in line with PAIA.

3. PURPOSE OF PAIA MANUAL

The purpose of this Manual is to assist clients, regulators, employees, and the public in understanding what information RCC Compliance Consulting holds and how such information may be lawfully accessed. The Manual provides guidance on the nature of available records, processes for requesting access, and circumstances under which access may be refused. As a compliance practice dealing with sensitive regulatory, financial, and personal information,

RCC Compliance Consulting takes measures to ensure that access to information is aligned with both transparency obligations and privacy protections. This Manual also supports the organisation's broader commitment to compliance with PAIA and POPIA.

4. APPLICABLE LEGISLATION

RCC Compliance Consulting operates within a highly regulated environment and is therefore subject to several laws governing information management, record-keeping, compliance services, and operational conduct. These include, but are not limited to:

- Promotion of Access to Information Act (PAIA)
- Protection of Personal Information Act (POPIA)
- Financial Advisory and Intermediary Services Act (FAIS)
- Financial Intelligence Centre Act (FICA)
- Companies Act 71 of 2008
- Basic Conditions of Employment Act
- Labour Relations Act
- Income Tax Act and SARS regulations
- Financial Sector Regulation Act

These pieces of legislation collectively shape how the organisation collects, stores, protects, and manages access to records.

5. ACCESS TO RECORDS HELD BY RCC COMPLIANCE CONSULTING

RCC Compliance Consulting maintains various categories of records necessary for the delivery of compliance services and operational functioning. Access to these records may be granted upon request, provided such access does not compromise confidentiality, POPIA protections, client rights, or legal and contractual obligations. Records include compliance reports, training records, client documentation for FAIS and FICA services, internal operational documents, employment-related files, and governance frameworks. The organisation carefully evaluates each request to ensure that access is lawful, justified, and aligned with the principles of responsible information handling.

6. RECORDS AVAILABLE WITHOUT A FORMAL PAIA REQUEST

Certain records are already available to the public without requiring a formal PAIA request. These include general company information accessible on the organisation's website,

marketing materials describing available services, and statutory corporate information lodged with regulatory bodies. RCC Compliance Consulting may also make selected policies or notices publicly accessible as part of its transparency initiatives. These documents support general understanding of the organisation's structure, services, and compliance capabilities.

7. RECORDS REQUIRING A FORMAL PAIA REQUEST

Some records held by RCC Compliance Consulting contain sensitive or confidential information and therefore require a formal PAIA request for access. These include client-specific compliance files, risk management plans, FICA and FAIS documentation, internal assessment reports, employee records, and financial documents not already publicly available. Because the organisation works with regulated institutions and maintains confidential information under both statutory and contractual obligations, requests for access to these records undergo strict evaluation to ensure compliance with applicable laws.

8. HOW TO REQUEST ACCESS TO RECORDS

To request access to records held by RCC Compliance Consulting, individuals must complete Form C, available through the Information Regulator's website. The completed form must be submitted to the Information Officer, together with proof of identity and sufficient details to identify the requested record. Requests should specify the preferred format of access and, where applicable, provide reasons for seeking the information. The organisation evaluates all requests in accordance with PAIA, ensuring that access does not infringe on the rights of third parties, breach confidentiality, or violate POPIA.

9. FEES PAYABLE

PAIA permits organisations to charge reasonable fees for processing and providing access to requested information. RCC Compliance Consulting may charge a request fee, reproduction fee, or access fee depending on the nature of the request. Fees may also apply for postage, courier services, or administrative time spent locating and preparing records for disclosure. Requesters will be informed in advance of any applicable fees, and processing will only proceed once payment is received.

10. GROUNDS FOR REFUSAL OF ACCESS

RCC Compliance Consulting may refuse access to certain records on lawful grounds, particularly where disclosure would compromise privacy, confidentiality, security, or regulatory

compliance. Grounds for refusal include protecting the personal information of third parties, safeguarding clients' confidential compliance documents, preserving commercially sensitive information, and maintaining legal privilege. Access may also be refused where disclosure is expressly prohibited by law or would endanger the safety or security of individuals, systems, or operations.

11. AVAILABILITY AND UPDATES TO THE MANUAL

This PAIA Manual is available at RCC Compliance Consulting's offices and may also be published on the company website for ease of reference. The organisation updates the Manual annually or whenever significant changes occur in legislation, internal processes, or regulatory expectations. RCC Compliance Consulting is committed to ensuring that all stakeholders always have access to accurate, current, and relevant information regarding PAIA processes.

12. CONTACT DETAILS OF THE INFORMATION REGULATOR

Information Regulator (South Africa)

Email: complaints.IR@justice.gov.za / infoereg@justice.gov.za

Website: www.justice.gov.za/infoereg