PAIA Manual

Prepared under section 51 of the Promotion of Access to Information Act 2 of 2000 as amended

Private Body	Lighthouse Risk Consulting (Pty) Ltd
Head and Information Officer	Jaco ("JP") Moolman, Managing Director
Effective date	15 September 2026
Document owner	Information Officer
Applies to	Company website, principal place of business during normal business hours, on request, and to the Information Regulator on request
Review trigger	Regularly and after any material change to records, processing, contact details or applicable law

1. Definitions and interpretation

In this Manual, PAIA means the Promotion of Access to Information Act 2 of 2000; POPIA means the Protection of Personal Information Act 4 of 2013; Regulator means the Information Regulator (South Africa); head means the person of highest authority or equivalent officer of the private body or a duly authorised person; record includes recorded information in Lighthouse's possession or under its control regardless of form or who created it; and personal information has the meaning in POPIA. Words defined in PAIA or POPIA carry those meanings unless the context indicates otherwise.

2. Part A About this Manual

2.1. Purpose and legal basis

This Manual helps a person identify records held by Lighthouse Risk Consulting (Pty) Ltd (Lighthouse), understand which records are available without a formal request, and make a valid request for access. It also records the personal-information processing disclosures required in PAIA and POPIA.

Under PAIA, a requester must be given access to a record of a private body when the record is required for the exercise or protection of a right, the procedural requirements are met, and no ground of refusal applies. PAIA provides access to existing records; it does not generally require Lighthouse to answer questions, create a new analysis or generate a record that does not exist.

Access is not automatic merely because a category is listed in this Manual. Privacy, commercial confidentiality, legal privilege, security, contractual duties, third-party rights and the grounds of refusal in PAIA remain applicable. Where only part of a record may lawfully be withheld, Lighthouse will consider severing that part and providing the remainder of such record.

2.2. Business profile

Lighthouse is a South African consulting, services and solutions business focused on regulatory compliance, governance, risk management, assurance, training, competency support and related administration for financial-services and specific other professional businesses. Its work may include, but not limited to, regulatory monitoring, client-file monitoring, fit-and-proper and competency records, FICA and governance support, training and CPD administration, compliance reporting, working papers, policies, registers and implementation support.

Lighthouse is a consultancy, not a software-as-a-service business. It uses FSPHub for compliance workflow and records, ACDevelop for its training, CPD and competency platform and related administration, and DotsAfrica for authorised screening and verification services when relevant. Viljieco IT is its managed service provider for IT infrastructure security support.

2.3. Contact details for access to information

Role or channel	Particulars
Head of private body and Information Officer	Jaco Moolman, Managing Director
Information Officer email	jaco@lighthouse-risk.co.za
Telephone	+27 81 754 5175
Street address	36 Royal Street, Ferndale Ext 6, Randburg, 2194
Website	www.lighthouse-risk.co.za

3. The Information Regulator's PAIA Guide

The Information Regulator has published a Guide under section 10 of PAIA explaining how to exercise rights under PAIA and POPIA, the forms and fees, assistance available, remedies and contact details. The Guide is available in every official language and in Braille and may be inspected or obtained from the Information Regulator.

Lighthouse will make the Guide available for consultation at its principal place of business during normal business hours, as required by the applicable Regulations.

- **Information Regulator PAIA page, Guide and current forms:** https://inforegulator.org.za/paia/
- **Information Regulator contact details:** https://inforegulator.org.za/contact-us/

4. Part B Records held and how they are available

4.1. Records available without a formal PAIA request

Lighthouse has not stated that a notice under section 52(2) has been published in the Gazette. The following public-facing records may nevertheless be made available voluntarily, subject to reasonable website terms, copyright, confidentiality and continued accuracy:

Category	Examples	Access route
Website legal information	Current Privacy Statement, PAIA Manual and other legal notices.	Website; electronic copy on request.
Corporate and contact information	Public company name, contact channels, service descriptions and authorised public profile information.	Website or public enquiry.
Public service and educational material	Public articles, regulatory updates, event details, brochures and non-confidential service information.	Website, public communication or request.
Prescribed forms and regulator resources	Links to current PAIA and POPIA forms and the Regulator's Guide.	Information Regulator website; Lighthouse website links where published.

Voluntary availability does not convert confidential proposals, client deliverables, training material, methodologies or intellectual property into public records. Lighthouse may remove, update or restrict voluntarily available material where lawful.

4.2. Records available under other legislation

The legislation below may require Lighthouse to create, retain, disclose or permit inspection of particular records. Access is available only to the person or authority entitled under that legislation and subject to its conditions. This list does not represent that every record is open to the public or that every statute applies to every engagement.

Legislation	Records or access context
Companies Act 71 of 2008	Incorporation, constitutional, securities, director, meeting, resolution, accounting and other company records; inspection rights apply as provided in sections 24 to 26 and related provisions.
POPIA 4 of 2013	A data subject's access to personal information under section 23, correction/deletion under section 24, and related processing records. Access under section 23 follows PAIA procedures.
PAIA 2 of 2000	This Manual, PAIA request and decision records, and access to qualifying existing records.
Income Tax Act 58 of 1962; Tax Administration Act 28 of 2011; Value Added Tax Act 89 of 1991	Tax registrations, returns, invoices, accounting records and supporting material available to SARS and other entitled persons under applicable law.

FAIS Act 37 of 2002 and subordinate measures	Where applicable to Lighthouse or held under a client mandate: compliance, advice, disclosure, complaints, representative, competency, supervision and monitoring records available to entitled regulators, clients or other persons as the law permits.
Financial Intelligence Centre Act 38 of 2001	Where applicable or held under a client mandate: risk, due-diligence, screening, transaction, reporting and training evidence available to the FIC, supervisory bodies and other entitled authorities.
Electronic Communications and Transactions Act 25 of 2002	Electronic transaction and communications records where the Act applies.
Labour and occupational legislation, where applicable	Employment, remuneration, leave, health and safety, equity, skills and statutory employment records available to employees, inspectors or authorities as the relevant law permits.
Financial Sector Regulation Act 9 of 2017 and other sectoral legislation	Records required by or made available to the FSCA, Prudential Authority or another competent regulator where applicable.

5. Subjects and categories of records

Lighthouse may hold the following records in physical or electronic form. A category is included if it may arise in the ordinary course of the business; inclusion does not confirm that a particular record exists.

Subject	Categories of records
Corporate governance and ownership	Incorporation documents; memorandum of incorporation; ownership and beneficial-ownership records; director and officer records; resolutions; governance policies; declarations; registers; statutory filings; licences, registrations and accreditations.
Strategy, risk and assurance	Business and continuity plans; risk assessments and registers; control records; compliance universe; monitoring plans; working papers; findings; remediation; attestations; audit trails; management reports.
Client and engagement management	Prospect and business-client details; mandates; engagement letters; proposals; instructions; correspondence; meeting notes; deliverables; service reports; project plans; client complaints; service-quality and closure records.
FSP licensing and regulatory profile	FSP details; licences and conditions; product categories; key-individual and representative records; regulator correspondence; profile changes; appointments; debarment or regulatory-status evidence where lawfully processed.
Fit and proper, competency and conduct	Qualifications; experience; dates of first appointment; regulatory examinations; class of business; product-specific training; CPD; supervision; honesty, integrity and good-standing information; declarations; assessments; evidence and remedial actions.
Compliance monitoring and client-file inspections	Sampling plans; source-file access logs; inspection checklists; FAIS and General Code of Conduct evidence; findings; management responses;

	action plans; closure evidence; reports. Underlying FSP client records are restricted and ordinarily held under the FSP's control.
FICA and financial-crime support	RMCPs; institutional risk assessments; customer due-diligence working papers; beneficial-ownership determinations; screening evidence; compliance reports; training records; reporting-support records; restricted information subject to FICA confidentiality and tipping-off limitations.
POPIA, PAIA and information governance	Privacy notices; this Manual; processing records; impact and risk assessments; operator agreements; access, objection, correction and deletion requests; consent where applicable; incident and breach records; retention and disposal records.
Training, CPD and professional development	Course material; attendance; enrolment; assessments; attempts; results; certificates; CPD allocations; competency histories; facilitator and accreditation evidence; reporting and platform logs.
Finance, tax and insurance	Quotations; invoices; payments; bank and accounting records; budgets; management accounts; tax and VAT records; asset and insurance records; supplier and expense records.
Suppliers and platforms	Due diligence; contracts; data-processing and confidentiality terms; service levels; security information; user and access records; support tickets; performance and incident records.
People and contractors	Recruitment and screening records; identity, contact, qualification and reference information; contracts; remuneration; leave; performance; disciplinary; training; health and safety; termination records, where applicable.
Information technology and security	Asset registers; architecture; configurations; access logs; authentication records; backups; incident records; vulnerability and patching records; continuity and recovery evidence; licences and support records.
Communications and intellectual property	Emails; letters; website content; public communications; brand assets; copyright material; templates; methodologies; research; training and development content.
Legal, disputes and regulatory matters	Legal advice and privileged material; contracts; claims; complaints; investigations; regulator enquiries; notices; litigation and dispute records; preservation holds.

6. Part C Processing of personal information

6.1. Purposes of processing

- Deliver and administer regulatory compliance, governance, risk, assurance, training, competency and related services;
- Help FSPs, and specific other professional and regulated business and their people meet and evidence lawful obligations;
- Conduct proportionate client-file inspections for compliance assurance without assuming the FSP's client relationship;
- Manage engagements, communications, platforms, access, billing, accounting, tax and suppliers;
- Verify identity, qualifications, experience or background when lawful and relevant;
- Protect confidential information, systems, users and business continuity;
- Respond to data-subject and PAIA requests, complaints, regulators, disputes and lawful processes; and
- Maintain required statutory, professional, contractual and evidential records.

6.2. Categories of data subjects and information

Data-subject category	Personal information that may be processed
Business clients, prospects and contacts	Identity and contact details; role; organisation; correspondence; mandate; service, meeting, complaint, billing and payment records; regulatory context.
FSPs and juristic persons	Registration, licence, ownership, governance, financial, regulatory, risk, complaint, monitoring and service information, including information linked to identifiable persons.
Key individuals, representatives and personnel	Identity and contact details; regulatory numbers; role; employment; qualification, experience and competency evidence; examinations; training; CPD; supervision; conduct and declarations; platform activity.
Inspected clients of an FSP	Only information reasonably necessary and incidentally visible or retained for the inspection: identifying details, product and advice records, disclosures, instructions, transactions, communications, complaints and limited financial or health-related information where relevant and lawfully held.
Suppliers, contractors and professional advisers	Identity, contact, registration, tax, bank, qualification, screening, contract, invoice, performance and communication records.
Website visitors and enquirers	Voluntarily submitted details and enquiry content; limited IP, device, browser or security-log data generated by hosting and security operations. No cookie information is used or collected through the website.
Regulators, officials and other stakeholders	Identity, role, contact, correspondence, authority, request, complaint and decision records.

6.3. Recipients or categories of recipients

Information or purpose	Recipients that may receive it
Engagement, compliance and competency records	The engaging business client and authorised personnel; regulators, ombuds or professional bodies where lawful; FSPHub and ACDevelop according to configured services.
Authorised verification and screening	DotsAfrica and relevant lawful source or verification bodies; the engaging business client and authorised decision-makers.
Finance, tax and company administration	Banks, payment providers, accountants, auditors, insurers, SARS, CIPC and authorised professional advisers.
Technology, communications and security	Viljieco IT as appointed MSP, and contracted hosting, backup, communications or technology providers operating under appropriate safeguards.
Legal, complaints and enforcement	Attorneys, advocates, courts, tribunals, regulators, statutory bodies and law-enforcement authorities where authorised or required.

7. Planned transborder flows

Lighthouse may use cloud, communications, support or backup services that process information or allow support access outside South Africa. Country-specific locations must be confirmed against the current supplier register and contract. Any transfer must satisfy POPIA, including an adequate foreign legal or contractual protection standard or another permitted ground. A platform name alone is not evidence of the hosting country or transfer safeguard.

8. General security safeguards

Lighthouse maintains risk-based safeguards intended to protect confidentiality, integrity and availability. These may include role-based access; strong authentication; secure configuration and transmission; encryption where appropriate; endpoint and malware protection; controlled backups; logging; confidentiality and operator terms; supplier due diligence; incident response; restricted special-information and screening results; retention and secure disposal; continuity arrangements; and periodic review.

Viljieco IT is appointed as Lighthouse's MSP for IT infrastructure security support. Its access must be limited to authorised support under appropriate safeguards, while Lighthouse retains accountability and oversight.

When Lighthouse acts as an operator for an FSP, it processes personal information only with the knowledge or authorisation of that FSP, treats it as confidential, applies agreed security measures and notifies the FSP immediately where there are reasonable grounds to believe unauthorised access or acquisition may have occurred.

9. Part D Requesting access

9.1. Before making a formal request

A requester should first check whether the record is publicly available, can be provided through an ordinary client-service channel, or concerns the requester's personal information. An informal enquiry does not suspend PAIA time periods unless Lighthouse accepts it as a compliant request. Lighthouse may assist a requester to identify the correct process without waiving any requirement or refusal ground.

A natural or juristic person may request access personally or through an authorised representative. A public body requesting a Lighthouse record under PAIA must be acting in the public interest and must require the record for the exercise or protection of a right other than a right of that public body.

9.2. How to submit a request

Use the current prescribed Form 2, Request for Access to Record, under regulation PAIA Regulations. A reference copy is included as Annexure D. Do not use the repealed older private-body Form C.
Address the request to the Information Officer using the verified email, street or postal address in section 2.3 of this Manual.

Attach proportionate certified proof of identity. If acting for someone else, attach certified proof of authority and identify the capacity in which the request is made.

Describe the existing record sufficiently to allow it to be located, including dates, subject matter, people, project or reference numbers where known.

Identify the right to be exercised or protected and explain why the requested record is required for that purpose. State the requested form and manner of access, preferred language, and how the decision should be communicated.

Pay the prescribed request fee when notified, unless no fee is payable under applicable law. Do not send bank details or payment until Lighthouse provides verified instructions.

Current PAIA Form 2: https://inforegulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form02-Reg7.pdf

9.3. Verification, assistance and scope

Identity verification protects the requester and third parties against unauthorised disclosure. Lighthouse will seek only the proof reasonably necessary for the risk and request. If a request is incomplete, Lighthouse may ask for the missing particulars. A person unable to make a written request because of illiteracy or disability may make the request orally. Lighthouse will provide reasonable assistance, reduce the oral request to the prescribed Form 2 and provide a copy to the requester.

The requester is not entitled to choose a method that would unreasonably interfere with Lighthouse's operations, damage a record, breach copyright or undermine security where PAIA permits another form of access. Access will generally be provided in the requested form if reasonably practicable and lawful.

9.4. Fees and deposits

A requester other than a personal requester may be required to pay the current prescribed private-body request fee of R140 before further processing. A personal requester is a requester seeking access to a record containing personal information about that requester and is not charged the request fee. If access is granted, reproduction, search, preparation and transfer costs may be payable at the prescribed rates.

Search and preparation time excludes the first hour; the current hourly rate is R145, capped at R435. If search and preparation are expected to exceed six hours, Lighthouse may require a deposit of one third of the applicable access fee calculated as prescribed. A record may be withheld until applicable fees are paid.

The current official fee schedule in Annexure A prevails if a figure in this Manual becomes outdated. Lighthouse will issue a written notice of fees and available remedies. If access is refused after a deposit has been paid, the deposit must be repaid. Actual postage, email or other electronic-transfer expense may be charged where applicable.

9.5. Decision period and extension

Lighthouse shall decide and notify the requester as soon as reasonably possible and in any event within 30 business days after receiving the request or the required particulars, unless third-party procedures apply. The period may be extended once for no more than a further 30 business days on a ground permitted with notice and reasons. A failure to decide within the applicable period is deemed a refusal.

9.6. Grounds on which access may or must be refused

Each request is assessed on its facts. Under PAIA, relevant grounds include:

- Mandatory protection against unreasonable disclosure of a natural third party's personal information;
- Mandatory protection of a third party's trade secrets, financial, commercial, scientific or technical information and information whose disclosure could cause commercial prejudice;
- Mandatory protection of confidential information where disclosure would breach a duty of confidence owed under an agreement;
- Protection of an individual's safety and of security methods, systems or property;
- Mandatory protection of legally privileged records unless privilege is waived by the person entitled to it;
- Protection of Lighthouse's trade secrets, commercial information, negotiating position, operations, methods and related records where refusal is permitted; and
- Mandatory protection of qualifying research information.
- Despite a refusal ground, disclosure where the record would reveal evidence of a substantial contravention of, or failure to comply with, the law or an imminent and serious public-safety or environmental risk, and the public interest in disclosure clearly outweighs the harm contemplated by the refusal provision.

9.7. Third-party notice and consultation

If a requested record may affect a third party, Lighthouse will response, as and where applicable. This may require notifying the third party, allowing representations or consent, and delaying access until the period for a complaint or court application has expired. The requester may not receive the substance of protected information merely because third-party notice is underway.

9.8. If a record cannot be found or does not exist

After taking all reasonable steps, if Lighthouse believes a record in its possession cannot be found or does not exist, the Information Officer will provide the affidavit or affirmation, describing the search steps and relevant communications. If the record is later found, access will be considered unless a lawful refusal ground applies.

9.9. Outcome and remedies

The written outcome will use or correspond substantially with current Form 3, included as Annexure E, and will state whether access is granted or refused, applicable fees and form of access, adequate statutory reasons for refusal without revealing protected content, and the applicable complaint or court remedy.

A private body has no statutory internal appeal under PAIA. A requester or third party may lodge a complaint with the Information Regulator using current PAIA Form 5, included as Annexure F, within 180 days of the refusal, deemed refusal or other complaint-triggering decision, subject to PAIA and condonation where applicable. A requester may also apply to a competent court, generally within 180 days of the relevant decision.

Choosing a remedy should take account of the event from which the applicable period runs.

PAIA forms and complaint guidance: https://inforegulator.org.za/paia/
Information Regulator complaints: https://inforegulator.org.za/complaints/

10. Availability and updating of this Manual

This Manual shall be available on Lighthouse's website, at its principal place of business for public inspection during normal business hours, to any person on request subject to the reasonable prescribed copying amount, and to the Information Regulator on request.

The head of the private body will update it regularly as required by section 51(2) of PAIA.

11. Annexure A Current private-body PAIA fees

The fee schedule below reflects the Information Regulator's published private-body fee structure available in March 2026. The prescribed official schedule, as amended from time to time, prevails.

Item	Current amount
Request fee payable by a requester other than a personal requester	R140.00
A4 photocopy or printed black-and-white copy	R2.00 per page or part
Printed copy of an A4-size page	R2.00 per page or part
Computer-readable copy on requester-provided flash drive	R40.00
Computer-readable copy on requester-provided CD	R40.00
Computer-readable copy on CD provided by Lighthouse	R60.00
Transcription of visual images or copy of visual images	Quoted outsourced cost
Transcription of an audio record	R24.00 per A4 page
Audio copy on requester-provided flash drive or CD	R40.00
Audio copy on CD provided by Lighthouse	R60.00
Search and preparation after the first hour	R145.00 per hour or part; maximum R435.00
Deposit where search exceeds six hours	One third of the prescribed applicable amount
Postage, email or other electronic transfer	Actual expense, if any

Information Regulator PAIA fee structure: https://inforegulator.org.za/wp-content/uploads/2026/03/PAIA-Fees-structure.pdf

12. Approval

Approved for publication by the head of the private body and Information Officer after completion and verification of the controlled publication particulars.

Role	Name and Surname	Approval date	Signature
Managing Director and Information Officer	Jaco Moolman	2026-09-15	

13. Annexure B Request readiness checklist

- Current Form 2 used and signed.
- Proof of identity attached; proof of authority attached if acting for another person.
- Existing record described precisely enough to locate.
- Right identified and necessity for exercising or protecting it explained.
- Preferred form, manner and language of access stated.
- Verified return contact details supplied.
- Request submitted to the confirmed Information Officer channel.
- Prescribed fee paid only after a verified written notice and payment instruction.

14. Annexure C Controlled legal and regulatory sources

- **Promotion of Access to Information Act 2 of 2000, consolidated text:** https://www.justice.gov.za/legislation/acts/2000-002.pdf
- **Protection of Personal Information Act 4 of 2013, consolidated text:** https://www.justice.gov.za/legislation/acts/2013-004.pdf
- **Department of Justice PAIA legislation, regulations and gazette notices:** https://www.justice.gov.za/paia/paia.htm - includes GG 45057, GoN 757 of 27 August 2021 and GG 52523, GoN 6126 of 17 April 2025
- **Information Regulator PAIA Guide, Manual template and forms:** https://inforegulator.org.za/paia/
- **Information Regulator POPIA forms:** https://inforegulator.org.za/popia-forms/
- **POPIA health-information regulations 2026:** https://www.gov.za/sites/default/files/gcis_document/202603/54268gon7198.pdf - GG 54268, GoN 7198 of 6 March 2026
- **Information Regulator contact details:** https://inforegulator.org.za/contact-us/
- **Information Regulator PAIA annual-report information:** https://inforegulator.org.za/paia-annual-report/ - current portal window published as 1 April to 30 June annually

15. Annexures D to F Prescribed PAIA forms

The following forms are reproduced from the Information Regulator's current PAIA Forms page as at 11 September 2026. They are included for practical use and retain the Regulator's prescribed wording and layout. Before submission, users should confirm that no later form has been published. Any historic contact particulars printed within a Regulator-issued form should be read with the Regulator's current contact details and eServices information referenced in this Manual.

Annexure	Prescribed form	Primary use	Information Regulator Link (Downloadable)
D	**Form 2** Request for Access to Record Regulation 7	Completed by a requester and submitted to Lighthouse.	Form 2 - Request for Access
E	**Form 3** Outcome of Request and Fees Payable Regulation 8	Completed and issued by Lighthouse's Information Officer.	Form 3 - Outcome of Request and Fees Payable
F	**Form 5** Complaint Form Regulation 10	Completed by a requester or third party and submitted to the Information Regulator.	Form 5 - Complain to the Information Regulator

Current Information Regulator PAIA Forms page: https://inforegulator.org.za/paia/

VERSION CONTROL AND DOCUMENT MANAGEMENT SHEET

DOCUMENT IDENTIFICATION	
REQUIRMENT	**DETAILS**
Policy Title	**COMPLAINTS MANAGEMENT FRAMEWORK**
Policy ID	PMAN_GOV_2026_1.0
Document Type	PAIA Manual, Section 51
Policy Category	Governance
Applies To	Company Representatives and Staff (as applicable)
Document Owner	Jaco (“JP”) Moolman
Approval Authority	
Approval Date	2026/09/15
Policy Status	Active
Next Review Date	2027/09/15

Version History			
Version	**Date**	**Description of Change**	**Approval by**
1.0	2026/09/15	First issue of PAIA Manual	Managing Director

DISTRIBUTION & AWARENESS	
DESCRIPTION	**DETAILS**
Communication to	**Staff, Clients**
Method of Communication	Website
Acknowledgement Required	Yes
Record Location	FSPHub: Lighthouse Compliance: Governance

CONTROL STATEMENT

This is a controlled notification document. Only the version indicated above is valid and enforceable. Unauthorised changes are prohibited. Superseded versions must be clearly marked and archived.

If a notification cannot be clearly identified, versioned, and owned, it is not under control.