



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

For

Verto SA (Pty) Ltd ("Verto")

Version 1.0

Effective date: November 2025

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List of Acronyms and Abbreviations

CEO	Chief Executive Officer
DIO	Deputy Information Officer
IO	Information Officer
Minister	Minister of Justice and Correctional Services
PAIA	Promotion of Access to Information Act No. 2 of 2000
POPIA	Protection of Personal Information Act No. 4 of 2013
Regulator	Information Regulator
Republic	Republic of South Africa

1. Introduction

Verto fosters a culture of transparency and accountability, striving to provide the public with effective access to the information we hold. We aim to assist individuals in exercising and protecting their rights under PAIA, subject to our obligation to protect personal information under POPIA.

2. Scope

This manual applies to Verto:

Full registered name	Verto SA Proprietary Limited
Registration number	2021/837445/07
Registered address & Postal address	Section 4A SS Time Square, 8 Elektron Street Erf No 13418, Techno Park Stellebosch, WC, 7600
Information Officer	Privacy Manager
Email address	dpo@vertofx.com

3. PAIA Guide

The Regulator has made available a guide on how to use PAIA (the “Guide”). The Guide is available in each of the official languages and in braille and can be accessed on the Regulator’s website [here](#).

4. Purpose of this Manual

For the purposes of PAIA, this manual details the procedure to be followed by a requestor and the manner in which a request for access shall be facilitated.

For the purposes of POPIA, this manual amongst other things, details:

- the purpose for which personal information may be processed;
- the categories of data subjects for whom Verto processes personal information;
- the categories of personal information relating to such data subjects; and,
- the recipients to whom personal information may be supplied.

For further information about Verto’s processing of customer personal information, please see our global [privacy policy](#) on our website.

5. Records Held

5.1. Records automatically available



Automatically available records are those that a public or private body will provide without the need for a requester to submit a PAIA request. For the avoidance of doubt, you do not have to fill out and submit the form in Annexure A to ask for these records.

Most records in this category are unlikely to contain sensitive information, including personal information, and are usually available on our [website](#) or can be requested by email.

The following are example of the types record that are automatically available:

- Newsletter and articles
- Adverts and promotions
- Public-facing policies and procedures
- Privacy and cookies notices
- Help centre articles
- Proof of reserves reports

5.2. Records available in terms of legislation

Where applicable to our operations, information is also available and/or we also retain records and documents where we are required to do so in terms of the provisions of the following statutes:

- Basic Conditions of Employment Act 75 of 1997;
- Companies Act 71 of 2008;
- Compensation for Occupational Injuries and Diseases Act 130 of 1993;
- Consumer Protection Act 68 of 2008;
- Electronic Communications and Transactions Act 25 of 2002;
- Employment Equity Act 55 of 1998;
- Financial Advisory and Intermediary Services Act, No 37 of 2002;
- Financial Intelligence Centre Act, No 38 of 2001;
- Income Tax Act No. 58 of 1962;
- Labour Relations Act 66 of 1995;
- National Credit Act 34 of 2005;
- Occupational Health and Safety Act. 85 of 1993;
- Protection of Personal Information Act 4 of 2013;
- Tax Administration Act 28 of 2011;
- Unemployment Insurance Act 63 of 2001; and
- Value-added Tax Act 89 of 1991.

5.3. Other records

The following records are classified and grouped as follows:

Category	Record
Statutory Company Information	Certificate of Incorporation
	Securities register

	<p>Certificate of Change of Name (if applicable)</p> <p>Memorandum of Incorporation</p> <p>Certificate to commence business</p> <p>Minute book, waivers and resolutions of shareholders and directors</p> <p>Director's register</p> <p>Copies of all share certificates</p> <p>Annual Financial Statements including:</p> <ul style="list-style-type: none"> - Annual accounts - Director's reports - Auditor's reports <p>Books of account regarding information required by the Companies Act, 71 of 2008</p>
Financial Records	<p>Books of account including journals and ledgers</p> <p>Financial statements</p> <p>Reports on returns, statements and receipts</p> <p>Banking records</p> <p>Debtors and creditors lists, statements and invoices</p>
Human Resource Records	<p>Employee name, date of birth, occupation</p> <p>Employee remuneration</p> <p>Employee records</p> <p>IRP5 certificate</p> <p>Employee contracts</p> <p>Human Resource policies and procedures</p>
Property records	Lease agreements
Agreements and Contracts	Agreements with contractors and third-party service providers
Tax	Copies of tax documents
Insurance	<p>Insurance policies</p> <p>Claim records</p>

Information Technology	Hardware
	Claim records
	Operating systems
	Software systems
	Software agreements and licenses
	Asset registers
Legal	Licenses and registrations
	Records of legal proceedings

6. Requesting Access to Information

6.1. Procedure

If you wish to request access to any categories of information referred to in Section 5 above, you are required to complete a request form as set out in **Annexure A** hereto. The Request for Access form must be completed with enough particularity to at least enable the Information Officer to identify the following:

- The record/s requested;
- The identity of the Requester;
- The form of access that is required, if the request is granted;
- The postal address or fax number of the Requester; and
- The right that the Requester is seeking to protect and an explanation as to why the record is necessary to exercise or protect such a right.

Verto will process the request for access within **30 (thirty) days** of receipt of such request, unless the request for access is of such a nature that an extension of the prescribed time limit is necessitated in accordance with section 57 of PAIA.

There is a prescribed fee (payable in advance) for requesting and accessing information in terms of PAIA. Details of these fees are contained in the request form in Annexure A, as well as in Annexure B hereto. You may also be called upon to pay the additional fees prescribed by regulation for searching for and compiling the information which you have requested, including copying charges.

6.2. Grounds for refusal

It is important to note that the access to information described under Section 4 above is not automatic: you must identify the right you are seeking to exercise or protect and explain why the record you request is required for the exercise or protection of that right. You will be notified in the manner indicated by you on the request form whether your request has been

approved. Requests for access to information may be refused on grounds recognised in PAIA.

7. Personal Information

7.1. Categories of data subjects and personal information

This section sets out the categories of personal information that Verto processes and the categories of data subjects the personal information relates to. For more detailed information, please refer to the global [privacy policy](#) on our website.

Category of Data Subject	Category of Personal Information
Customers / Prospective customers	Name, contact details, identity number and/or company information and directors' information (where applicable) and other information which may be required to verify a customer's identity
	Biometric information
	Banking and financial details
	Transaction and product usage information
	Other information not specified but reasonably required to be processed for business operations
Vendors / suppliers / other business relationships	Name, contact details, identity number and/or company information and directors' information (where applicable) and other vendor / supplier identifiable information
	Banking and financial details
	Information about products or services
	Information pertaining to the relationship with Verto
	Other information not specified but reasonably required to be processed for business operations
Employees and job candidates	Name, contact details, identity number, and other employee identifiable information
	Employment history and references
	Banking and financial details
	Details of payments to third parties (i.e. deductions from salary)

	Other information not specified but reasonably required to be processed for business operations such as background checks
Visitors	Physical and electronic access records
	CCTV footage
	Full name and contact details

7.2. Categories of recipients

The following persons or legal entities may be recipients of information from Verto:

- Any entity within the group of companies to which Verto belongs, including holding and subsidiary companies, and companies under common control;
- Any firm, organisation or person who provides Verto with products or services;
- Any payment system which Verto uses;
- Regulatory and governmental authorities or ombudsmen, or other authorities, including tax authorities and/or law enforcement, where Verto has a duty to share information;
- Third parties to whom payments are made on behalf of employees, including pension funds and medical schemes;
- Financial institutions from whom payments are received on behalf of data subjects;
- Employees, contractors and temporary staff; and
- Agents (if applicable).

7.3. Purposes of processing

The purposes of processing data subjects' personal information include:

For employment purposes:

- Verification of a job applicant's information during the employment application process;
- General matters and/or administration relating to personnel, including processing of payroll, medical aid, provident funds, or any other benefits;
- Disciplinary action;
- Training; and
- Any other reasonably required purpose relating to the employment or possible employment relationship.

For vendors/suppliers/other business relationships:

- Verifying information and performing required checks;
- Purposes relating to the agreement or business relationship or possible agreement or business relationships between the parties;

- Payment;
- Complying with relevant regulatory or other obligations;
- Reporting; and
- Any other reasonably required purpose relating to Verto's business.

For the provision of our services and related purposes:

- Verifying information and performing required checks in accordance with Know Your Customer (KYC), Anti-Money Laundering (AML), Counter-Terrorist Financing (CFT), and sanctions screening requirements;
- In order to provide customers with products and services and otherwise manage and maintain customers' accounts;
- To communicate with customers and respond to customer inquiries and disputes;
- To prevent fraudulent or unauthorized use of our products and services;
- To better manage our business and customers' relationship with us;
- To improve our products and services, and to develop new products and services;
- To notify customers about benefits and changes to the features of our products and services;
- To provide customers with personalized advertising and marketing; and
- In order to comply with any subpoena or other valid legal request, including from law enforcement and/or regulatory bodies.

For more information about our purposes for processing customer personal data, please refer to our global [privacy policy](#) on our website.

7.4. Planned trans-border flows of personal information

Verto currently foresees the following reasons for possible trans-border flow of personal information, which it undertakes to do in compliance with POPIA:

- Storing information electronically;
- Making use of third party service providers to fulfil a business function on behalf of the company;
- Reporting to its parent entity, and other entities within the Verto group of companies (i.e. subsidiaries, holding companies, or entities under common control);
- Use of operating systems implemented by Verto; and
- Any transfers of information cross-border as required and mandated by service providers and/or regulators.

7.5. Information security measures

Verto implements the following general processes and procedures as reasonable measures to protect the integrity and confidentiality of personal information:

- General awareness and training programs;
- Retention policies for information;
- Secure systems and devices (where appropriate); and
- Undertakings from third party suppliers who have access to personal information;

- information security policies and processes; and
- process for reporting risks identified or security breaches.

7.6. Requesting access to personal information

You may request access to personal information relating to you by submitting a request to us via email to dpo@vertofx.com. Subject to the validity of the request and presentation of satisfactory evidence of your identity (and, if applicable, your authority to act on behalf of the data subject), we will endeavour to respond to your request within **30 (thirty) days**.

8. Availability of the Manual

A copy of the Manual is available:

- On our website;
- At Verto's registered address for public inspection during normal business hours;
- To any person upon request and upon the payment of a reasonable prescribed fee; and
- To the Information Regulator upon request.

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.

9. Updating the Manual

This manual will be updated regularly.

Annexure A : Request for Access to Information Form

FORM 2

REQUEST FOR ACCESS TO RECORD

[Regulation 7]

NOTE:

1. *Proof of identity must be attached by the requester.*
2. *If requests made on behalf of another person, proof of such authorisation, must be attached to this form.*

TO: The Information Officer

(Address)

E-mail address:

Fax number:

Mark with an "X"

Request is made in my own name

Request is made on behalf of another person.

PERSONAL INFORMATION

Full Names			
Identity Number			
Capacity in which request is made (when made on behalf of another person)			
Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B):		Facsimile:
	Cellular:		
Full names of person on whose behalf request is made (if applicable):			
Identity Number			
Postal Address			

Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		

PARTICULARS OF RECORD REQUESTED

Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)

Description of record or relevant part of the record:	
Reference number, if available	
Any further particulars of record	

TYPE OF RECORD *(Mark the applicable box with an "X")*

Record is in written or printed form	
Record comprises virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
Record consists of recorded words or information which can be reproduced in sound	
Record is held on a computer or in an electronic, or machine-readable form	

FORM OF ACCESS
(Mark the applicable box with an "X")

Printed copy of record (<i>including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form</i>)	
Written or printed transcription of virtual images (<i>this includes photographs, slides, video recordings, computer-generated images, sketches, etc</i>)	
Transcription of soundtrack (<i>written or printed document</i>)	
Copy of record on flash drive (<i>including virtual images and soundtracks</i>)	
Copy of record on compact disc drive(<i>including virtual images and soundtracks</i>)	
Copy of record saved on cloud storage server	

MANNER OF ACCESS
(Mark the applicable box with an "X")

Personal inspection of record at registered address of public/private body (<i>including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form</i>)	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format (<i>including transcriptions</i>)	
E-mail of information (<i>including soundtracks if possible</i>)	
Cloud share/file transfer	
Preferred language (Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED

If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.

Indicate which right is to be exercised or protected	

Explain why the record requested is required for the exercise or protection of the aforementioned right:	

FEES	
a)	<i>A request fee must be paid before the request will be considered.</i>
b)	<i>You will be notified of the amount of the access fee to be paid.</i>
c)	<i>The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.</i>
d)	<i>If you qualify for exemption of the payment of any fee, please state the reason for exemption</i>
Reason	

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	Facsimile	Electronic communication (Please specify)

Signed at _____ this _____ day of _____ 20 _____

Signature of Requester / person on whose behalf request is made

FOR OFFICIAL USE

<i>Reference number:</i>	
<i>Request received by: (State Rank, Name And Surname of Information Officer)</i>	
<i>Date received:</i>	
<i>Access fees:</i>	
<i>Deposit (if any):</i>	

Signature of Information Officer

Annexure B: Schedule of Fees For Private Bodies

The requester fee payable by every requestor	R140.00
Photocopy	R2.00
Printed Copy	R2.00
For a copy in a computer-readable format on:	
- Flash drive	R40.00
- Compact disk - to be provided by requester	R40.00
- Compact disk - to be provided by Verto	R60.00
Transcription of visual images	Service to be outsourced
Copy of visual images	Service to be outsourced
Transcription of an audio record	R24.00
For a copy in a computer-readable format on:	
- Flash drive	R40.00
- Compact disk - to be provided by requester	R40.00
- Compact disk - to be provided by Verto	R60.00
To search for and prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation. Not to exceed the total cost of R 435.00	R145.00
Deposit: If search exceeds 6 (Six) hours	One third of amount per request excluding requester fees, search and postage costs
Postage, email or any other electronic transfer	Actual costs