FYREFEM FUND MANAGERS (PTY) LTD

PAIA Manual

Promotion of Access to Information Act 2 of 2000

Section 51 Manual | Private Body | Compiled: October 2021 | Revised: May 2025

Entity	FyreFem Fund Managers (Pty) Ltd
Registration No.	2017/174497/07
FSP Licence	49359 — Category I & II (Investments)
Information Officer	Cathy Goddard (CEO)
Email	projectsteam@fyrefem.com
Website	www.fyrefem.com
Head Office	Regus, 1st Floor, Block B, North Park, Black River Park, 2 Fir Street, Observatory, Cape Town, 7925
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Version	V4

1. List of Acronyms and Abbreviations

Acronym / Term	Meaning
CEO	Chief Executive Officer
IO	Information Officer
Minister	Minister of Justice and Correctional Services
PAIA	Promotion of Access to Information Act No. 2 of 2000 (as amended)
POPIA	Protection of Personal Information Act No. 4 of 2013
Regulator	Information Regulator
Republic	Republic of South Africa
FICA	Financial Intelligence Centre Act 38 of 2001
FAIS	Financial Advisory and Intermediary Services Act 37 of 2002
FSCA	Financial Sector Conduct Authority

Where a term is not defined above, the definition applicable in the Promotion of Access to Information Act 2 of 2000 (as amended) shall apply.

2. Purpose of the PAIA Manual

This PAIA Manual is prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (PAIA), as amended, and is intended to assist members of the public to:

- check the categories of records held by FyreFem which are available without a formal PAIA request;
- understand how to make a request for access to a record, by reference to the subjects on which FyreFem holds records and the categories of records held on each subject;
- identify records available in accordance with other applicable legislation;
- access the contact details of the Information Officer;
- understand the description of the Guide on how to use PAIA, as updated by the Regulator, and how to obtain it;
- understand whether FyreFem processes personal information, the purpose of such processing, and the categories of data subjects and information concerned;
- identify the recipients or categories of recipients to whom personal information may be supplied;
- understand whether FyreFem plans to transfer or process personal information outside the Republic of South Africa; and
- understand the security measures in place to protect personal information processed by FyreFem.

3. Key Contact Details

The following contact details are provided to assist the public with requests for access to information held by FyreFem Fund Managers (Pty) Ltd.

Role / Detail	Information
Chief Information Officer	
Name	Cathy Goddard
Email	projectsteam@fyrefem.com
General Contact & Head Office	
Email	projectsteam@fyrefem.com
Website	www.fyrefem.com
Postal Address	Regus, 1st Floor, Block B, North Park, Black River Park, 2 Fir Street, Observatory, Cape Town, 7925
Physical Address	As above

4. Guide on How to Use PAIA

4.1 Availability of the Guide

The Regulator has, in terms of section 10(1) of PAIA (as amended), updated and made available a revised Guide on how to use PAIA (the "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. The Guide is available in each of the official languages and in Braille.

4.2 Contents of the Guide

The Guide contains a description of the following:

- the objects of PAIA and POPIA;
- the postal and street address, phone and fax number and, if available, electronic mail address of the Information Officer of every public body, and every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA;
- the manner and form of a request for access to a record of a public body (section 11) and a private body (section 50);
- the assistance available from the IO of a public body in terms of PAIA and POPIA;
- the assistance available from the Regulator in terms of PAIA and POPIA;
- 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 an internal appeal, a complaint to the Regulator, and an application to a court;
- the provisions of sections 14 and 51 of PAIA requiring public and private bodies respectively to compile a manual, and how to obtain access to a manual;
- the provisions of sections 15 and 52 of PAIA providing for the voluntary disclosure of categories of records by public and private bodies respectively;
- the notices issued in terms of sections 22 and 54 of PAIA regarding fees payable in relation to requests for access; and
- the regulations made in terms of section 92 of PAIA.

4.3 Obtaining the Guide

Members of the public may inspect or obtain copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours. The Guide may also be obtained:

- upon request to the Information Officer at projectsteam@fyrefem.com; or
- from the website of the Regulator: https://www.justice.gov.za/inforeg/

A copy of the Guide is available for public inspection during normal office hours in the following official languages:

- English
- Afrikaans

5. Records Available Without a Formal PAIA Request

The following categories of records are automatically available from FyreFem without a person having to submit a formal PAIA request:

Category of Records	Types of Record	Available on Website	Available on Request
Corporate Governance	Board Members	✓	
Fund Mandate	Pitch Deck Summary		✓
Financial Services	FSCA Licence (FSP 49359)		✓
Business Activities	Overview of Business Activities	✓	
Media Engagement	Discussions on Gender Lens and Women in Private Equity		✓

6. Records Available in Accordance with Other Legislation

The following records of FyreFem are available in accordance with legislation other than PAIA:

Category of Records	Applicable Legislation
Memorandum of Incorporation	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000
Complaints Policy	Financial Advisory and Intermediary Services Act 37 of 2002 (FAIS Act)

7. Subjects on which FyreFem Holds Records

The following table sets out the subjects on which FyreFem holds records and the categories of records held in respect of each subject:

Subjects on which the body holds records	Categories of Records
Strategic Documents, Plans, Proposals	Annual Reports; Strategic Plan; Annual Performance Plan
Human Resources	HR policies and procedures; Advertised posts; Employee records; Registered Representative information (FAIS); Fit and Proper information (FAIS)
Compliance Policies	Policies required by the FAIS Act; Registers required by the FAIS Act
Financial Records	Annual Financial Statements as required by the Companies Act and the FAIS Act
Marketing Material	Pitch Decks; Placement Documents; Business Plans
Company Secretarial	Shareholder Registers; Board Minutes

8. Processing of Personal Information

8.1 Purpose of Processing

FyreFem processes limited personal information relating to its clients, staff, and representatives for the purposes of FAIS and FICA compliance, and for the administration of its business as a licensed financial services provider.

8.2 Categories of Data Subjects and Information Processed

Category of Data Subjects	Personal Information that may be Processed
Clients	Name; address; registration or identity numbers; Know Your Client information as per FICA legislation
Service Providers	Name; VAT numbers; address; registration or identity numbers; KYC information as per FICA legislation; trade secrets; bank details
Employees	Identity number; address; qualifications; gender; race

8.3 Recipients of Personal Information

Personal information held by FyreFem may be supplied to the following categories of recipients:

Category of Personal Information	Recipients
Representatives' identity number, address, qualifications and names — for registering representatives on FyreFem's representative register (and on the FSCA's public website)	Financial Services Conduct Authority (FSCA)
Board members' identity number, address, qualifications, tax status and number and names — for Government Tenders	State-Owned Entities

8.4 Transborder Flows of Personal Information

FyreFem stores its records on a Dropbox cloud-based system. This system may involve storage and processing outside the Republic of South Africa. FyreFem takes reasonable steps to ensure that any such transborder flows comply with the requirements of POPIA.

8.5 Information Security Measures

FyreFem has implemented a data protection policy which includes the following security measures to ensure the confidentiality, integrity, and availability of personal information:

- password protection for all systems and devices;
- anti-virus and anti-malware solutions; and
- restricted access to personal information on a need-to-know basis.

9. Availability of this Manual

A copy of this Manual is available:

- on the FyreFem website at www.fyrefem.com;
- at the head office of FyreFem 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 this Manual, as contemplated in Annexure B of the Regulations, shall be payable per A4-size photocopy made.

9.1 Updating of the Manual

The head of FyreFem will on a regular basis review and update this Manual. The current version and any updates will be made available on the FyreFem website.

Issued by

Issued by	Cathy Goddard — CEO, FyreFem Fund Managers (Pty) Ltd
Date	May 2025
Version	V3
Next Review	May 2026

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Cathy Goddard | Chief Executive Officer
FyreFem Fund Managers (Pty) Ltd | FSP 49359