



# PAIA MANUAL

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

**DATE OF COMPILATION: 01/07/2025**

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## **LIST OF ACRONYMS AND ABBREVIATIONS**

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|-----|--------------------|--|
| 1.1 | <b>“CEO”</b>       | Chief Executive Officer;   |
| 1.2 | <b>“COO”</b>       | Chief Operations Officer;  |
| 1.3 | <b>“IO”</b>        | Information Officer;   |
| 1.4 | <b>“Minister”</b>  | Minister of Justice and Correctional Services;                     |
| 1.5 | <b>“PAIA”</b>      | Promotion of Access to Information Act No. 2 of 2000 (as Amended); |
| 1.6 | <b>“POPIA”</b>     | Protection of Personal Information Act No. 4 of 2013;              |
| 1.7 | <b>“Regulator”</b> | Information Regulator; and   |
| 1.8 | <b>“Republic</b>   | Republic of South Africa.  |

## **PURPOSE OF PAIA MANUAL**

This PAIA Manual is useful for the public to-

- 2.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 2.2 have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- 2.3 know the description of the records of the body which are available in accordance with any other legislation;
- 2.4 access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;
- 2.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 2.6 know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 2.9 know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- 2.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

## KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF PYXIS INVESTMENT MANAGEMENT (PTY) LTD

### 3.1. Chief Information Officer

Name: Ashley Carin Knight  
Tel: +27 (0) 79 510 7422  
Email: Ashley.knight@pyxis-im.com

### 3.2. Deputy Information Officer

Name: Benjamin Jacobus van Wyk  
Tel: +27 (0) 82 336 4523  
Email: benjamin.vanwyk@pyxis-im.com

### 3.3 Access to information general contacts

Email: talk2us@pyxis-im.com

### 3.4 National or Head Office

Physical Address: 33 Medborn Crescent, Midstream Estate, Midrand, 1692  
Telephone: +27 (0) 82 336 4523  
Email: talk2us@pyxis-im.com  
Website: www.pyxis-im.com

## GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

- 4.1 The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA (“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.
- 4.2 The Guide is available in each of the official languages and in braille.
- 4.3 The aforesaid Guide contains the description of-
- 4.3.1. the objects of PAIA and POPIA;
  - 4.3.2. the postal and street address, phone and fax number and, if available, electronic mail address of-
    - 4.3.2.1. the Information Officer of every public body, and
    - 4.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA<sup>1</sup> and section 56 of POPIA<sup>2</sup>;
  - 4.3.3. the manner and form of a request for-
    - 4.3.3.1. access to a record of a public body contemplated in section 11<sup>3</sup>; and
    - 4.3.3.2. access to a record of a private body contemplated in section 50<sup>4</sup>;
  - 4.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;

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<sup>1</sup> Section 17(1) of PAIA- *For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.*

<sup>2</sup> Section 56(a) of POPIA- *Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.*

<sup>3</sup> Section 11(1) of PAIA- *A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

<sup>4</sup> Section 50(1) of PAIA- *A requester must be given access to any record of a private body if-*

- a) *that record is required for the exercise or protection of any rights;*
- b) *that person complies with the procedural requirements in PAIA relating to a request for access to that record; and*
- c) *access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

- 4.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;
- 4.3.6. 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-
  - 4.3.6.1. an internal appeal;
  - 4.3.6.2. a complaint to the Regulator; and
  - 4.3.6.3. an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;
- 4.3.7. the provisions of sections 14<sup>5</sup> and 51<sup>6</sup> requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- 4.3.8. the provisions of sections 15<sup>7</sup> and 52<sup>8</sup> providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 4.3.9. the notices issued in terms of sections 22<sup>9</sup> and 54<sup>10</sup> regarding fees to be paid in relation to requests for access; and
- 4.3.10. the regulations made in terms of section 92<sup>11</sup>.

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<sup>5</sup> Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

<sup>6</sup> Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.

<sup>7</sup> Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access

<sup>8</sup> Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access

<sup>9</sup> Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

<sup>10</sup> Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

<sup>11</sup> Section 92(1) of PAIA provides that –“The Minister may, by notice in the Gazette, make regulations regarding-  
(a) any matter which is required or permitted by this Act to be prescribed;  
(b) any matter relating to the fees contemplated in sections 22 and 54;  
(c) any notice required by this Act;  
(d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and  
(e) any administrative or procedural matter necessary to give effect to the provisions of this Act.”

4.4 Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.

4.5 The Guide can also be obtained-

4.5.1. upon request to the Information Officer;

4.5.2. from the website of the Regulator (<https://www.justice.gov.za/infoereg/>).

**CATEGORIES OF RECORDS OF PYXIS INVESTMENT MANAGEMENT WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS**

Category of records	Types of the Record	Available on Website	Available upon request
Compliance	Privacy Policy	X	X
Compliance	Complaints Resolution Process	X	X
Compliance	Treating Customers Fairly (TCF) Policy	X	X
Compliance	POPI Policy	X	X
Compliance	Conflicts of Interest Policy	X	X

**DESCRIPTION OF THE RECORDS OF PYXIS INVESTMENT MANAGEMENT WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION**

Category of Records	Applicable Legislation
Memorandum of Incorporation	Companies Act 71 of 2008
Register of Shareholders	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000
POPI Consent	Protection of Personal Information Act, 2013
FSCA License	The Financial Advisory and Intermediary Services Act 37 of 2002
Discretionary Mandate	The Financial Advisory and Intermediary Services Act 37 of 2002
FAIS Disclosure	The Financial Advisory and Intermediary Services Act 37 of 2002
Advertising Guidelines	The Financial Advisory and Intermediary Services Act 37 of 2002
Ethics Policy	The Financial Advisory and Intermediary Services Act 37 of 2002

Complaints Resolution Policy	The Financial Advisory and Intermediary Services Act 37 of 2002
IT Policies	Joint Standard 1 of 2023 on IT Governance and Risk Management and the Joint Standard 2 of 2024 on Cybersecurity and Cyber Resilience Requirements
FIC Risk Management and Compliance Programme	The Financial Intelligence Centre Act (FICA), Act 38 of 2001, and its subsequent amendments, particularly the Financial Intelligence Centre Amendment Act

**DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY PYXIS INVESTMENT MANAGEMENT**

<b>Subjects on which the body holds records</b>	<b>Categories of records</b>
Strategic Documents, Plans, Proposals	Annual Reports, Strategic Plan, Annual Performance Plan.
Human Resources	<ul style="list-style-type: none"> <li>- HR policies and procedures</li> <li>- Advertised posts</li> <li>- Employees records</li> </ul>
CRM and Administration	- Client records
Compliance	- Compliance policies and procedures
Operations - Company	<ul style="list-style-type: none"> <li>- Company Records, Resolutions, CIPC Records</li> <li>- Business Relationship Agreements, Service Provider Agreements</li> <li>- Accounting Records, Annual Financial Statements</li> </ul>
Operations – Marketing	- Marketing Publications, Marketing Document Database
Operations – Investment Management	- Trade History, Investment Process Records, Portfolio Models

## PROCESSING OF PERSONAL INFORMATION

### 8.1 Purpose of Processing Personal Information

*We collect, retain, use and disclose personal information mainly to provide clients with access to the services and products that we provide. We will only process client information for a purpose they would reasonably expect, including:*

- *Providing advice, products and services that suit client needs as requested*
- *To verify client identity*
- *To notify clients of new products or developments that may be of interest to them*
- *To confirm, verify and update client details*
- *To comply with any legal and regulatory requirements*

### 8.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

<b>Categories of Data Subjects</b>	<b>Personal Information that may be processed</b>
Customers / Clients	name, address, registration numbers or identity numbers, employment status, tax residency details, bank details, political exposure details, residency details, source of funds details, source of wealth details, source of income details, contact information, other
Service Providers	names, registration number, vat numbers, address, bank details, other
Employees	identity number, residency details, tax residency details, residency details address, qualifications, bank details, contact information, other

**The recipients or categories of recipients to whom the personal information may be supplied**

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Identity number and names, for criminal checks and sanction screening	South African Police Services, FIC TFS, OFAC, Interpol, other
Qualifications, for qualification verifications	South African Qualifications Authority, other
Credit and payment history, for credit information	Credit Bureaus, other
All personal information as deemed appropriate for onboarding of a client at partnering service providers	Servicing Financial Service Providers, other

**Planned transborder flows of personal information**

*Cloud storage of personal information is provided by reputable global companies, Microsoft and Amazon Azure. To the extent that service providers operate globally, personal information is shared internationally.*

**General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information**

Microsoft provides comprehensive data protection for SharePoint through encryption, access controls, and data loss prevention (DLP) features. Data is encrypted both at rest and in transit, and organizations can configure granular permissions and DLP policies to restrict access and prevent data leakage. More information can be accessed on [Microsoft’s](#) website.

Smartsheet prioritises data protection through encryption, secure software development practices, and robust security measures. They use encryption both in transit (TLS 1.2/1.3) and at rest (AES-256) to safeguard data. Additionally, Smartsheet employs industry-standard protections against common web vulnerabilities and offers

features like Customer Managed Encryption Keys (CMEK) for enhanced security. More information can be accessed on [Smartsheet's](#) website.

Service providers who operate globally include: SCM DMA (Pty) Ltd, Glacier International, Investec, Investec Mauritius Limited, Momentum Wealth International, Swissquote, other.

## **AVAILABILITY OF THE MANUAL**

8.3 A copy of the Manual is available-

8.3.1 on [www.pyxis-im.com](http://www.pyxis-im.com)

8.3.2 to any person upon request and upon the payment of a reasonable prescribed fee; and

8.3.3 to the Information Regulator upon request.

8.4 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.

## **UPDATING OF THE MANUAL**

The Information Officer at Pyxis Investment Management will review this manual on a regular basis and update it as appropriate.

***Issued by***

***Ashley Knight, CFA)***

***Pyxis Investment Management***

***Information Officer***

***COO***