

TURLOV FAMILY OFFICE SECURITIES (PTY) LTD
PROMOTION OF ACCESS TO INFORMATION ACT MANUAL

February 2024

Date of issue/update	Created: January 2024	Version	1
Policy owner	Legal Department		
Approved by	Director	01/02/2024	

1. INTRODUCTION

Turlov Family Office Securities (PTY) Ltd is a company established under the laws of the Republic of South Africa, registration №2022/274852/07, hereinafter referred to as the “Company”, authorized by Financial Sector Conduct Authority of the Republic of South Africa (“FSCA”) to provide investment services and perform investment activities specified in our licence (license number 52874).

The purpose of this document is to map out Company’s commitment to the Promotion of Access to Information Act and to formalise our processes and procedures in order for all staff members, clients and/or other interested parties to become aware as to the correct steps to follow in the event of such information requests.

2. DEFINITIONS

FSP means financial services provider;

FAIS Act means the Financial Advisory and Intermediary Services Act, No. 37 of 2002;

FSCA means the Financial Sector Conduct Authority;

Data Subject means the person to whom the Personal Information relates;

POPIA means the Protection of Personal Information Act No.4 of 2013;

PAIA means the Promotion of Access to Information Act No. 2 of 2000;

Information Regulator means the Office of the Information Regulator as established in terms of section 39 of POPIA, to monitor and enforce compliance with both POPIA and PAIA;

Personal Information means any information relating to an identifiable natural person, or to the extent applicable, a juristic person. This includes, but is not limited to information relating to race, gender, sex, pregnancy, marital status, ethnic and social origin, colour, sexual orientation, age, physical or mental health, religion, disability, language, information relating to educational, medical, financial, criminal or employment history, any identifying number, email address, physical address, telephone number, location information, online identifier or biometric Personal Information;

Process or Processing means any activity concerning Personal Information including the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use, dissemination by means of transmission, distribution or making available in any other form, or merging, linking, as well as restriction, degradation, erasure or destruction of information.

Record/s means any recorded information regardless of the form, including, for example, written documents, audio, digital and video materials. A Record requested from a public or private body refers to a Record that is in that body’s possession regardless of whether that body created the Record;

Responsible Party means a public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for Processing Personal Information.

Requester: The requester is any person(s) (Natural Person) and/or external or 3rd party requesting Information from an FSP.

3. COMPANY CONTACT DETAILS

Director	Oleksandr Tsyhlin (Executive Director) E-mail: info@tfos.com
Information Officer	Oleksandr Tsyhlin E-mail: info@tfos.com
Postal address	121 Beyers Naude Drive, Roosevelt Park, Gauteng, 2
Street address	121 Beyers Naude Drive, Roosevelt Park, Gauteng, 2
Telephone	+27 67 699 7596
Website	www.tfos.com

4. ACCESS TO RECORDS AND SCHEDULE OF RECORDS

PAIA grants a requester access to certain Records of a private body if the said Records are required to exercise or protect any rights of the requester. Should a public body lodge such a request, it must be acting in the public interest.

Any request for information in terms of PAIA, must be made in accordance with the prescribed form and manner, at the rates provided. The prescribed form and manner and the tariff are dealt with in sections 6 and 7.

Record	Subject	Availability
Public affairs	Public product information Public corporate records Media releases	Freely available on website
Financial	Financial statements Financial tax records Asset register Management records	Request in terms of PAIA
Marketing	Market information Public customer information Field records Performance records Product sales records	Limited information available on website Limited information on website Request in terms of PAIA

	Customer database	
Companies Act records	Documents of incorporation Memorandum of incorporation Records relating to appointment of Auditors/secretaries/public officer Share register	Request in terms of PAIA
Personnel	Employment contracts Employment equity plan Medical aid records Pension fund records Disciplinary records Training records Leave records	Request in terms of PAIA

5. FORM OF A REQUEST FOR INFORMATION

A requester must use the prescribed Form 2 to request access to the information as per paragraph 4 above.

Form 2 can be accessed at the following URL: <https://info regulator.org.za/paia-forms/>.

The request must be addressed to the Information Officer as indicated in clause 3.

The requester must provide sufficient detail on Form 2 to enable the Information Officer of the company to establish who is requesting the said information as well as what information is being requested and in what format.

The requester must provide sufficient detail in respect of his/her contact details and if the requester wishes to be informed of the decision of the company in any manner (in addition to written) the manner and particulars thereof.

Lastly, the right which the requester is seeking to exercise or protect with an explanation of the reason the Record is required to exercise or protect the right.

If the request is granted, then a further access fee must be paid for the search, reproduction, preparation and for any time that has exceeded the prescribed hour to search and prepare the Record for disclosure.

If the request is refused in terms of either the mandatory or discretionary grounds of refusal, the FSP must notify the requester thereof.

6. PRESCRIBED FEES

A requester who seeks access to a Record containing Personal Information about that requester is not required to pay a request fee.

- The above-mentioned statement; refers to “requester” as an existing client of the Company, should the Client of Company seek access to a Record, which refers to the Client of the Company in reference to himself or herself, containing Personal Information related to himself or herself, is not required to pay the prescribed fees as stated below, however, the existing Client of the Company will be required and expected to provide relevant FICA documents, as supporting documents, for the purpose of the Company to verify and confirm the existence of the said, Client of the Company.

Every other requester, not a personal requester, this refers to that of a Private Company or Business, non-existing client of the Company which would therefore be unable to provide the relevant documentation related to verification as per FICA, must pay or is obligated to pay the required request fee, as prescribed from time to time.

The request fee is R50 (excl. VAT) and may change from time to time.

If the preparation of the Record requested requires more than the prescribed hours (six), a deposit shall be paid (of not more than one third of the access fee which would be payable if the request were granted).

A requestor may lodge an application with a court against the tender/payment of the request fee and/or deposit.

Records may be withheld until the fees have been paid.