GROSVENOR FOREX

Grosvenor Forex Services (Pty) Ltd

POPIA & PAIA MANUAL

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1. LIST OF ACRONYMS AND ABBREVIATIONS

1.1	**"DIO"**	Deputy Information Officer;
1.2	**"IO"**	Information Officer;
1.3	**"PAIA"**	Promotion of Access to Information Act No. 2 of 2000;
1.4	**"POPIA"**	Protection of Personal Information Act No.4 of 2013;
1.5	**"Regulator"**	Information Regulator; and
1.6	**"Republic"**	Republic of South Africa

2. DEFINITIONS

2.1 **Data Subject** means the person to whom the Personal Information relates.

2.2 **Responsible Party** means the entity which determines the purpose of and means for processing Personal Information.

2.3 **Operator** means the company or a person who processes Personal Information for a Responsible Party in terms of a contract or mandate, without coming under the direct authority of the Responsible Party.

2.4 **Personal Information** means Information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to:

2.4.1 Information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;

2.4.2 Information relating to the education or the medical, financial, criminal or employment history of the person;

2.4.3 any identifying number, symbol, email address, physical address, telephone number, location Information, online identifier or other particular assignment to the person;

2.4.4 the biometric Information of the person;

2.4.5 the personal opinions, views or preferences of the person;

2.4.6 correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;

2.4.7 the views or opinions of another individual about the person; and

2.4.8 the name of the person if it appears with other Personal Information relating to the person or if the disclosure of the name itself would reveal Information about the person.

2.4.9 Special Personal Information includes:

2.4.9.1 religious or political beliefs

2.4.9.2 race or ethnic origin

2.4.9.3 trade union membership

2.4.9.4 political opinions

2.4.9.5 health, sexual life

2.4.9.6 criminal behaviour.

2.5 **Processing** means any operation or activity or any set of operations, whether or not by automatic means, concerning Personal Information, including:

2.5.1 the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;

2.5.2 dissemination by means of transmission, distribution or making available in any other form; or

2.5.3 merging, linking, as well as restriction, degradation, erasure or destruction of Information.

3. INTRODUCTION AND PURPOSE

This manual is published in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (PAIA), as amended, and includes the prescribed overview of personal information processing under the Protection of Personal Information Act 4 of 2013 (POPIA). It is intended to be read together with the Company's existing, separately published Privacy Policy.

Grosvenor Forex Services (Pty) Ltd ("Grosvenor Forex" or "the Company") provides foreign exchange intermediary services. This manual explains the categories of records held by the Company, how a person may request access to a record, and the general manner in which the Company processes personal information.

PAIA gives effect to the constitutional right of access to information, subject to its procedures and grounds for refusal. POPIA regulates the lawful processing of personal information. A request for a record of a private body must satisfy the requirements of PAIA, including that the record is required for the exercise or protection of a right.

4. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION

Item	Details
Registered company name	Grosvenor Forex Services (Pty) Ltd

Item	Details
Company registration number	2001/022196/07
FSCA FSP number	40264
Nature of business	Foreign exchange intermediary services
Physical / registered address	8 Columbia Crescent, Durban, 4302
Postal address	8 Columbia Crescent, Durban, 4302
General telephone and email	082 565 8822. Email: info@grosvenorforex.co.za.
Website	grosvenorforex.co.za
Information Officer	Mr. Douglas Haynes
Information Officer contact	doug@grosvenorforex.co.za | 082 565 8822
Deputy Information Officer, if designated	None designated

5. PAIA GUIDE AND INFORMATION REGULATOR

The Information Regulator makes available a Guide explaining how PAIA may be used, including the procedure for requesting access to records and available remedies. The Guide and prescribed forms can be obtained from the Information Regulator at https://inforegulator.org.za/paia/ or requested through the Company's Information Officer:

Information Regulator: 010 023 5200 | enquiries@inforegulator.org.za | www.inforegulator.org.za.

PAIA complaints: PAIAComplaints@inforegulator.org.za;

POPIA complaints: POPIAComplaints@inforegulator.org.za .

A copy of the PAIA Guide, in English, will be available for inspection at the Company's offices.

6. RECORDS AVAILABLE WITHOUT A FORMAL PAIA REQUEST

Information made publicly accessible by Grosvenor Forex may be viewed without submitting a formal PAIA request. Subject to publication and availability, this may include:

Category	How to access
Company profile, service information and general contact details	Company website
Privacy Policy and this PAIA & POPIA Manual	Company website or request to Information Officer
Other notices or publications expressly made public	Company website, where published
Conflict of Interest Policy, Complaints Policy, TCF Policy and Website Disclaimer, once published	Company website – Compliance page

7. RECORDS HELD UNDER APPLICABLE LEGISLATION

The Company may create or retain records in accordance with legislation applicable to its business. The principal record types and legislation are summarised below. The precise records held depend on the Company's activities and legal obligations.

Types of records	Legislative basis
Company registration, statutory filings and corporate records	Companies Act 71 of 2008
FSP authorisation, client disclosure and financial services records	Financial Advisory and Intermediary Services Act 37 of 2002; Financial Sector Regulation Act 9 of 2017
Client identification, due diligence and transaction-related records	Financial Intelligence Centre Act 38 of 2001
Foreign exchange transaction / exchange-control supporting records	Currency and Exchanges Act 9 of 1933 and applicable exchange-control requirements
Personal information and access request records	POPIA 4 of 2013; PAIA 2 of 2000
Tax, invoicing, financial and accounting records	Income Tax Act 58 of 1962; Tax Administration Act 28 of 2011; Value-Added Tax Act 89 of 1991

Types of records	Legislative basis
Employment and payroll records	Basic Conditions of Employment Act 75 of 1997 and applicable employment legislation

8. SUBJECTS AND CATEGORIES OF RECORDS HELD

The following is a general description of record categories, not a guarantee that a particular record exists or will be disclosed. Access is assessed in accordance with PAIA and other applicable legislation.

Subject	Examples of record categories
Corporate and governance	Company registration, statutory returns, governance and appointment records
Client onboarding and compliance	Client correspondence, identification and verification records, beneficial ownership information, mandates and compliance records
Foreign exchange services	FX instructions, transaction confirmations, bank or beneficiary information and supporting transaction documents
Financial and accounting	Banking, invoices, accounting, tax and financial statements
Service providers and contracts	Supplier agreements, communications and service records
Human resources	Employee contracts, payroll records and recruitment CVs
Information technology and operations	Systems records, website records, security and operational correspondence

9. REQUESTS FOR ACCESS TO RECORDS UNDER PAIA

9.1 How to submit a request

- Complete the prescribed **PAIA Form 2** (Request for Access to Record)
- Describe the record required, the right to be exercised or protected, and why the record is required for that purpose.
- Provide proof of identity and, where acting for another person, proof of authority to act.
- Submit the form and supporting documents to the Information Officer at the contact details in section 4. Any prescribed fee will be communicated where applicable.

9.2 Decision, fees and grounds for refusal

In accordance with section 56 of PAIA, the Company must decide whether to grant or refuse a request for access to records and notify the requester as soon as reasonably possible, but no later than 30 days after receiving the request or the required particulars, subject to the statutory provisions relating to third-party notification and intervention.

In terms of section 57 of PAIA, the Company may extend the decision period once, for a maximum of 30 additional days, where the prescribed grounds for an extension are met. These include requests involving extensive records, records held at another office, necessary consultations or the requester's written consent. The requester must be notified within the original 30-day period of the extension, its duration, the reasons for the extension and the available remedies.

The Company will record requests received, monitor the applicable statutory deadlines and retain records of decisions and extension notices. Decisions will be communicated using the prescribed PAIA Form 3. Where access is refused, the Company will provide adequate reasons, including the relevant statutory grounds for refusal, and advise the requester of their right to lodge a complaint with the Information Regulator or approach a court.

Fees will be determined in accordance with section 54 of PAIA and the prescribed fee structure applicable to private bodies, as published by the Information Regulator. These may include a request fee, access fees and, where applicable, a deposit, subject to any statutory exemption.

In accordance with section 23(1)(a) of POPIA, a data subject may request confirmation, free of charge, of whether the Company holds personal information about them. Requests for access to a record or description of that personal information may, however, attract prescribed fees in terms of section 23(1)(b) of POPIA. Applicable fees will be communicated to the requester in accordance with the relevant statutory requirements.

Access may be refused where PAIA requires or permits refusal, including to protect a third party’s privacy, confidential or commercially sensitive information, or legally privileged material.

If a record cannot be located after all reasonable steps have been taken, or the record does not exist, the Company will notify the requester by affidavit or affirmation, setting out the steps taken to locate the record, in accordance with section 55 of PAIA.

9.3 Complaints and other remedies

There is no internal PAIA appeal process for private bodies. A requester who is dissatisfied with a decision may complain to the Information Regulator or apply to a court for appropriate relief, subject to PAIA and applicable time limits. Information on complaint procedures is available at https://inforegulator.org.za/paia/

10. PROCESSING OF PERSONAL INFORMATION UNDER POPIA

Grosvenor Forex is a responsible party under POPIA when it determines the purposes and means of processing personal information. This section provides the general processing description required in a PAIA manual. The Company's separately published Privacy Policy remains the principal website notice explaining its handling of personal information.

10.1 Purposes of processing

Personal information is processed to respond to enquiries, identify and onboard clients, arrange foreign exchange services, communicate regarding transactions, meet regulatory requirements, maintain records, handle complaints and protect legal rights. Client information is obtained directly from clients, including through Capitec Bank's required account-opening forms. Grosvenor Forex is an authorised intermediary of Capitec Bank. Enquiry information is not used for marketing, and Grosvenor Forex does not conduct electronic direct marketing.

10.2 Categories of data subjects and information

Data subjects	Personal information that may be processed
Website visitors and enquirers	Names, contact details and enquiry content; IP addresses, browser/device information and technical logs processed by hosting and IT providers to deliver, secure and troubleshoot the website. No advertising pixels, behavioural tracking or non-essential analytics are currently used.
Clients, representatives and beneficial owners	Identity and contact information, addresses, company and beneficial-ownership details, authority records, personal/business financial information and documents required for Capitec account opening and compliance checks
Transaction parties / beneficiaries	Bank or beneficiary details, payment instructions, transaction amounts, currencies, source-of-funds information and transaction documents
Service providers and business contacts	Contact, company, contractual, correspondence and payment-related information, where applicable
Employees and job applicants	Employee contracts, payroll information and recruitment CVs, with related contact and employment information as lawfully required

10.3 Recipients or categories of recipients

Client account-opening and foreign exchange information is shared with Capitec Bank to arrange the requested services. Hosting, email and IT service providers may process information to support communications, systems and records. Information may also be disclosed to regulators, the Financial Intelligence Centre, Ombuds, courts or other competent authorities where required or permitted by law. Relevant client information may be made available to our external compliance consultant for compliance reviews, subject to confidentiality and data-protection requirements.

10.4 Transborder flows of personal information

For international payments, Capitec Bank transmits payment information to overseas banks through SWIFT, and those messages may contain personal information required to process the transaction. The Company's email and certain IT services may involve processing outside South Africa, including storage in Europe. Where Grosvenor Forex transfers personal information outside South Africa, it does so in accordance with section 72 of POPIA, including where the transfer is necessary to perform a contract with the data subject or where the recipient is subject to adequate data-protection safeguards.

10.5 General information security measures

Grosvenor Forex's security policy requires appropriate and reasonable safeguards against loss, unauthorised access, alteration or disclosure.

Access to personal information is restricted to authorised personnel and service providers who require such access for legitimate business purposes.
Where third-party service providers process personal information on behalf of Grosvenor Forex, appropriate confidentiality and security obligations apply, including written operator agreements as required by section 21 of POPIA.
These safeguards and the Company's retention and disposal procedures are implemented under the oversight of the Information Officer.

Retention and disposal of personal information

Grosvenor Forex's standard retention period for client and transaction information, including account-opening records held by the Company, is five years after the last transaction, subject to any longer applicable statutory or lawful retention requirement.

Grosvenor Forex retains personal information only for as long as necessary to fulfil the purposes for which it was collected, or as otherwise required or permitted by law.

Where applicable, client identification and transaction records are retained in accordance with the Financial Intelligence Centre Act, 38 of 2001 (FICA), which prescribes minimum retention periods of five years, calculated from the relevant statutory triggering events.

Once the applicable retention period has expired and no lawful basis for further retention exists, personal information will be securely destroyed, deleted or de-identified in accordance with section 14 of POPIA.

Website enquiries

Personal information submitted through the Company's website enquiry facility is processed only to respond to and manage enquiries and is not used for electronic direct marketing. The website does not maintain a separate database of enquiry submissions; enquiries are delivered to info@grosvenorforex.co.za through the Company's hosting and email services.

11. POPIA ENQUIRIES, REQUESTS AND OBJECTIONS

Subject to POPIA, a data subject may request confirmation of whether personal information is held, request access, seek correction or deletion where applicable, object to qualifying processing, or withdraw consent where processing depends on consent. Requests should be sent to the Information Officer (section 4). Identity verification will be required.

The Information Regulator provides prescribed forms for an **objection to processing (POPIA Form 1)** and a **request for correction or deletion (POPIA Form 2)** at https://inforegulator.org.za/popia/

Complaints regarding personal information processing may be submitted to POPIAComplaints@inforegulator.org.za

12. AVAILABILITY, MAINTENANCE AND APPROVAL

This manual will be available on the Company's website, at its offices for inspection during ordinary business hours, and from the Information Officer upon request. Any applicable copying or access fees will be dealt with under the applicable regulations.

The Company will review the manual when necessary to reflect changes in its operations, records, contact details or legal requirements. This manual does not replace the separately published Privacy Policy.

Approval / publication item	Details
Issued by / Information Officer	Douglas Haynes, Director
Date approved	30 October 2026
Effective date	30 October 2026
Website publication location	https://grosvenorforex.co.za/compliance

APPENDIX - FORMS AND REFERENCES

- Appendix 1 - PAIA Form 2 (Request for Access),
- Appendix 2 - Form 3 (Outcome and Fees)
- Appendix 3 - POPIA Form 1 (Objection)
- Appendix 4 - Form 2 (Correction / Deletion)

APPENDIX 1

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 *(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)*	
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 *(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)*	
Written or printed transcription of virtual images *(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)*	
Transcription of soundtrack *(written or printed document)*	
Copy of record on flash drive *(including virtual images and soundtracks)*	
Copy of record on compact disc drive*(including virtual images and soundtracks)*	
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 *(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)*	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format *(including transcriptions)*	
E-mail of information *(including soundtracks if possible)*	
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) A request fee must be paid before the request will be considered. *b) You will be notified of the amount of the access fee to be paid.* *c) 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.* *d) If you qualify for exemption of the payment of any fee, please state the reason for exemption*	
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

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

_____

Signature of Information Officer

APPENDIX 2

OUTCOME OF REQUEST AND OF FEES PAYABLE
[Regulation 8]

1. *If your request is granted the—*
   (a) amount of the deposit, (if any), is payable before your request is processed; and
   (b) requested record/portion of the record will only be released once proof of full payment is received.
2. *Please use the reference number hereunder in all future correspondence.*

Reference number: _____

TO: _____
_____
_____
_____

Your request dated _____, refers.

1. You requested:

Personal inspection of information at registered address of public/private body *(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)* is free of charge. You are required to make an appointment for the inspection of the information and to bring this Form with you. If you then require any form of reproduction of the information, you will be liable for the fees prescribed in Annexure B.	

OR

2. You requested:

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

3. To be submitted:

Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format *(including transcriptions)*	
E-mail of information *(including soundtracks if possible)*	
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)*	

Kindly note that your request has been:

☐ Approved

☐ Denied, for the following reasons:

4. Fees payable with regards to your request:

Item	Cost per A4-size page or part thereof/item	Number of pages/items	Total
Photocopy	R2.00		
Printed copy	R2.00		
For a copy in a computer-readable form on: (i) Flash drive • To be provided by requestor (ii) Compact disc • If provided by requestor • If provided to the requestor	 R40.00 R40.00 R60.00		
For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on the quotation of the service provider		
Copy of visual images			
Transcription of an audio record, per A4-size	R24.00		
Copy of an audio record (i) Flash drive • To be provided by requestor (ii) Compact disc • If provided by requestor • If provided to the requestor	 R40.00 R40.00 R60. 00		
Postage, e-mail or any other electronic transfer:	Actual costs		
TOTAL:			

5. Deposit payable (if search exceeds six hours):

☐ Yes ☐ No

Hours of search		Amount of deposit *(calculated on one third of total amount per request)*	

The amount must be paid into the following Bank account:
Name of Bank: _____
Name of account holder: _____
Type of account: _____
Account number: _____
Branch Code: _____
Reference Nr: _____
Submit proof of payment to: _____

Signed at _____this _____day of _____20 _____

_____
Information officer

APPENDIX 3

OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF SECTION 11(3) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2017

[Regulation 2(1)]

Note:

1. *Affidavits or other documentary evidence in support of the objection must be attached.*
2. *If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.*

Reference Number….

A	**DETAILS OF DATA SUBJECT**
Name and surname of data subject:	
Residential, postal or business address:	
	Code ( )
Contact number(s):	
Fax number:	
E-mail address:	
B	**DETAILS OF RESPONSIBLE PARTY**
Name and surname of responsible party*(if the responsible party is a natural)*:	
Residential, postal or business address:	
	Code ( )
Contact number(s):	
Fax number:	
E-mail address:	

Name of public or private body*(if the responsible party is not a natural person)*:	
Business address:	
	Code ( )
Contact number(s):	
Fax number:	
E-mail address:	

C **REASONS FOR OBJECTION** *(Please provide detailed reasons for the objection)*

Signed at ..... this ..... day of .....20……..

.....

Signature of data subject (applicant)

APPENDIX 4

REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION IN TERMS OF SECTION 24(1) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2017

[Regulation 3(2)]

Note:

1. Affidavits or other documentary evidence in support of the request must be attached.
2. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.

Reference Number....

Mark the appropriate box with an "x".

Request for:

☐ Correction or deletion of the personal information about the data subject which is in possession or under the control of the responsible party.

☐ Destroying or deletion of a record of personal information about the data subject which is in possession or under the control of the responsible party and who is no longer authorised to retain the record of information.

A	**DETAILS OF THE DATA SUBJECT**
Surname:	
Full names:	
Identity number:	
Residential, postal or business address:	
	Code ( )
Contact number(s):	
Fax number:	
E-mail address:	
B	**DETAILS OF RESPONSIBLE PARTY**
Name and surname of responsible party*(if the responsible party is a natural person)*:	
Residential, postal or	

business address:	
	Code ( )
Contact number(s):	
Fax number:	
E-mail address:	
Name of public or private body *(if the responsible party is not a natural person)*:	
Business address:	
	Code ( )
Contact number(s):	
Fax number:	
E-mail address:	

C	**REASONS FOR *CORRECTION OR DELETION OF THE PERSONAL INFORMATION ABOUT THE DATA SUBJECT/*DESTRUCTION OR DELETION OF A RECORD OF PERSONAL INFORMATION ABOUT THE DATA SUBJECT WHICH IS IN POSSESSION OR UNDER THE CONTROL OF THE RESPONSIBLE PARTY.** *(Please provide detailed reasons for the request)*

***** *Delete whichever is not applicable*

Signed at ..... this ..... day of .....20……..

.....

Signature of Data subject