PAIA MANUAL

Prepared under section 51 of the Promotion of Access to Information Act 2 of 2000

SWISS FINANCIAL CONSULTING CC
trading as ADVISOR OFFICE

Registration no. 1992/033840/23 | Authorised Financial Services Provider no. 2569

Original compilation	1 May 2018
New edition prepared	5 August 2026
Version	1.0

About this manual

This manual describes how to request access to records held by Swiss Financial Consulting CC trading as Advisor Office (AO). It is prepared under section 51 of the Promotion of Access to Information Act 2 of 2000 (PAIA) and includes the disclosures required by section 51(1)(c) in relation to the Protection of Personal Information Act 4 of 2013 (POPIA).

AO is an authorised financial services provider that assists individuals, families, employers and member groups with international health insurance, medical scheme and employee-benefit related services. This manual applies to records held by AO in any format, subject to PAIA, POPIA and other applicable law.

> **Important:** Listing a record in this manual does not mean that access is automatic. Each request is considered under PAIA, including the grounds on which access must or may be refused.

Key terms

- AO means Swiss Financial Consulting CC trading as Advisor Office.
- Information Officer means the head of the private body for PAIA purposes and the person responsible for the functions assigned under POPIA.
- Personal information, processing, responsible party, operator and data subject have the meanings given in POPIA.
- Regulator means the Information Regulator (South Africa).
- Record means recorded information in AO's possession or under its control, regardless of its form or when it came into existence.

Body and contact details

Private body

Legal name	Swiss Financial Consulting CC
Trading name	Advisor Office
Registration number	1992/033840/23
FSP number	2569
Street address	c/o Regus, 35 Fricker Road, Ethos Building, Ground Floor, Illovo, Sandton, 2196
Postal address	c/o Regus, 35 Fricker Road, Ethos Building, Ground Floor, Illovo, Sandton, 2196
Telephone	+27 (0)11 268 0211
PAIA / POPIA email	management@advisoroffice.com
Website	www.advisoroffice.com

Information Officer

Name	Lisa Jones
Capacity	Managing Director and Information Officer
Email	management@advisoroffice.com
Telephone	+27 (0)11 268 0211
Address	As stated above

Deputy Information Officer

Full name	Tiaan Goussard
Job title	Strategic Operations Manager
Designation date	05 August 2026
Shared contact email	management@advisoroffice.com
Telephone	+27 (0)11 268 0211
Address	As stated above

The Information Regulator's PAIA Guide

The Regulator has issued a plain-language Guide explaining how PAIA works, how to identify the correct body, how to make a request, applicable fees and available remedies. The Guide also explains access to personal information under POPIA.

The current Guide can be accessed from the Regulator's PAIA Guidelines page in English, Afrikaans and other official languages.

English and Afrikaans copies of the Guide may be inspected at AO's principal place of business during normal business hours. A copy may also be requested from AO at management@advisoroffice.com or from the Regulator using Form 1.

Physical address	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Postal address	P.O. Box 31533, Braamfontein, Johannesburg, 2017
Telephone	+27 (0)10 023 5200
General email	enquiries@inforegulator.org.za
Website	www.inforegulator.org.za

Records available without a formal PAIA request

AO does not rely on a current notice published under section 52(2) of PAIA. The following public-facing records are nevertheless ordinarily available without submitting Form 2, subject to reasonable identification of the record and any applicable copyright or use restrictions.

Category	Examples	How to access
Corporate information	Trading name, contact details, service information and statutory disclosures	AO website or request by email
Public service material	Brochures, explanatory material and forms intended for public use	AO website or request by email
Privacy and access information	Privacy notices, cookie information, this PAIA manual and public POPIA information	AO website or request by email
Public terms	Website terms, disclaimers and other published terms	AO website

A request for a record in this category may still need to be handled under PAIA if it is not already public, contains protected information, or requires material search, extraction or redaction.

Records available under other legislation

Where applicable, records may be inspected or obtained under legislation other than PAIA. Availability depends on the requester, the record and the relevant law.

Legislation	Indicative records
Close Corporations Act 69 of 1984	Member and statutory corporate records
Financial Advisory and Intermediary Services Act 37 of 2002 and subordinate requirements	Licensing, advice, intermediary services, disclosures, compliance and complaints records
Financial Sector Regulation Act 9 of 2017	Regulatory, supervisory and conduct-related records
Financial Intelligence Centre Act 38 of 2001	Risk management, identification, verification, monitoring and compliance records, where applicable
Insurance Act 18 of 2017; Long-term Insurance Act 52 of 1998; Short-term Insurance Act 53 of 1998 and applicable subordinate measures	Insurance, policy, intermediary and client records, to the extent applicable
Medical Schemes Act 131 of 1998	Medical scheme application, membership, benefit, contribution and related service records
Pension Funds Act 24 of 1956	Employee-benefit and retirement-fund related records, where applicable
Protection of Personal Information Act 4 of 2013 and its Regulations	Personal-information access, correction, objection, processing and security records
Promotion of Access to Information Act 2 of 2000 and its Regulations	PAIA manual, requests, decisions, fees and reporting records
Consumer Protection Act 68 of 2008; Electronic Communications and Transactions Act 25 of 2002	Consumer, electronic transaction, communication and complaint records

Legislation	Indicative records
Income Tax Act 58 of 1962; Tax Administration Act 28 of 2011; Value-Added Tax Act 89 of 1991	Accounting, invoice, tax, payroll and supporting records
Applicable employment legislation, including the BCEA, LRA, EEA, COIDA, UIF and skills-development legislation	Employment, payroll, leave, occupational injury, training and statutory workforce records

Subjects and categories of records held

Subject	Categories of records
Corporate governance	Founding and registration records; member and management records; policies; delegations; insurance; premises and asset records
FSP licensing and compliance	Licences; compliance reports; monitoring; registers; competency and training; conflicts; disclosures; regulatory correspondence; statutory submissions
Clients, members and advice	Enquiries; quotations; needs analyses; recommendations and records of advice; applications; policies; memberships; beneficiaries and dependants; service correspondence; reviews
Health, claims and assistance	Health and medical information; underwriting support; claims; pre-authorisations; treatment or assistance coordination; supporting documents and correspondence
Employer and group business	Employer agreements; group/member schedules; eligibility and enrolment; benefit selections; contribution and service records; authorised contact details
Finance and tax	Accounting records; invoices; receipts; commissions and fees; bank and payment records; budgets; financial statements; tax and audit records
Human resources	Recruitment; employment and contractor records; remuneration; leave; performance; training; disciplinary and termination records; statutory workforce records
Suppliers and operators	Due diligence; proposals; agreements; service levels; confidentiality and data-processing terms; invoices; performance and correspondence
Technology and security	System and user administration; access records; service-provider records; backups; security monitoring; incident and business-continuity records
Marketing and communications	AO's own campaigns; mailing lists; consents and preferences; website and social-media content; enquiries; event and communication records
Complaints, legal and risk	Complaints; ombud and regulator matters; disputes; legal advice; litigation; risk assessments; incidents and investigations

How to request access

When PAIA access applies

A requester must show that the record is required for the exercise or protection of a right, comply with PAIA's procedural requirements, and provide enough detail for AO to identify the record and the requester. A request for the requester's own personal information may also engage section 23 of POPIA.

Submit Form 2

Use the current prescribed PAIA Form 2, available from the Regulator's PAIA Forms page. Send the completed form and supporting documents to management@advisoroffice.com or deliver them to AO's street address.

1. Identify the requester, the capacity in which the request is made and, if acting for someone else, provide proof of authority.
2. Describe the requested record sufficiently and state the preferred form of access.
3. Identify the right to be exercised or protected and explain why the record is required for that purpose.
4. Provide contact details and any information needed for AO to communicate with the requester or accommodate a disability.

Decision, fees and access

- AO will ordinarily decide a valid request within 30 days. PAIA permits one extension of up to 30 days in specified circumstances, in which case AO will notify the requester.
- A requester other than a personal requester may be required to pay the prescribed request fee before processing. As at 5 August 2026, the private-body request fee is R140.
- Prescribed search, preparation, reproduction, media, transcription, postage and deposit charges may also apply. AO will issue the prescribed notice before requiring payment.
- Access may be granted in the requested form where reasonably possible, subject to PAIA, protection of third parties, severability and payment of applicable fees.
- AO may refuse access only on a ground permitted or required by PAIA and will give the requester the required notice of its decision.

The current official fee schedule is available from the Information Regulator. The schedule in force when the request is made will apply.

Complaints and remedies

There is no internal appeal against the decision of a private body. If AO refuses a request, fails to respond within the permitted period, charges a disputed fee or otherwise does not comply with PAIA, the requester or affected third party may lodge a complaint with the Regulator using Form 5, generally within 180 days, or seek relief from a competent court in accordance with PAIA.

Complaint form and guidance	https://inforegulator.org.za/complaints/
PAIA complaints email	PAIAComplaints@inforegulator.org.za
Regulator telephone	+27 (0)10 023 5200

POPIA processing information

This section provides the information required by PAIA section 51(1)(c). It is a high-level description and should be read with AO's applicable privacy notices and service terms.

Purposes of processing

- Responding to enquiries; providing quotations; assessing needs and suitability; giving advice and maintaining records of advice.
- Submitting and administering insurance, medical scheme, membership and employee-benefit applications, enrolments, policies and services.
- Supporting underwriting, claims, pre-authorisations, assistance and service coordination.
- Managing client, member, dependant, beneficiary, employer and business-partner relationships and communications.
- Verifying identity; preventing fraud; meeting FSP, financial-sector, tax, employment, anti-money-laundering and other legal or regulatory duties.
- Billing, collecting or reconciling payments, fees and commissions; accounting, audit and financial reporting.
- Handling complaints, disputes, legal matters, risk, quality assurance and regulatory enquiries.
- Managing employees, contractors, suppliers, operators, systems, security, continuity and administration.
- Conducting AO's own lawful marketing and managing consent, preferences and opt-outs.

Categories of data subjects and personal information

Data subject category	Information or categories of information
Clients, prospective clients, members, dependants and beneficiaries	Identity, contact and demographic details; identification documents; employment and occupational details; financial and banking information; insurance, scheme and benefit information; health, medical, underwriting, claim and pre-authorisation information; communications, preferences, consents and supporting documents
Employees, applicants and contractors	Identity and contact details; qualifications and work history; employment, remuneration, payroll, tax, banking, leave, performance and training information; limited health or emergency information where lawful; dependant and emergency-contact information
Employer and group clients and their representatives	Organisation and authorised-contact details; employment, group eligibility, membership, benefit-selection, contribution, billing, service and communication information
Insurers, medical schemes, administrators, advisors, suppliers, operators and other business partners	Representative contact details; business, contract, licensing, due-diligence, tax, banking, service, performance and correspondence information
Website users, enquirers and recipients of AO communications	Contact and enquiry details; device, technical, cookie and usage information; communication history; preferences, consent and opt-out records
Regulators, public authorities, ombuds, complainants and other correspondents	Identity and contact details; regulatory, complaint, investigation, legal, risk and correspondence information

Special information: AO may process health information and personal information relating to children or dependants where necessary and lawful for the requested service. AO does not ordinarily process biometric information or criminal-offence information.

Recipients or categories of recipients

AO supplies personal information only where necessary and lawfully permitted. Depending on the service and the data subject, recipient categories may include:

- insurers, underwriting entities, reinsurers, medical schemes, scheme or policy administrators and managed-care organisations;
- healthcare, emergency assistance, claims, pre-authorisation and related service providers;
- employer or group clients and their authorised administrators, where appropriate and lawful;
- regulators, supervisory authorities, ombuds, courts, law-enforcement bodies and other public authorities;
- banks, payment providers, auditors, accountants, legal advisers and other professional advisers; and
- IT, cloud, hosting, CRM, communications, document-management, security and other operators providing services to AO under appropriate confidentiality and security obligations.

Planned transborder flows

AO's services have an international component. Personal information may therefore be transferred to, accessed from or stored in other countries when AO engages international insurers, administrators, medical or assistance providers, reinsurers, business partners, clients, cloud platforms, email, document-management, CRM, hosting or technical-support providers.

General security measures

AO uses proportionate organisational, technical and physical safeguards intended to protect the confidentiality, integrity and availability of personal information. At a general level, these measures include:

- role-based access restrictions, user authentication and review of access to systems and records;
- endpoint, network, email and malware protections and timely maintenance of systems;
- secure transmission and storage measures where appropriate, backups and business-continuity arrangements;
- confidentiality commitments, supplier/operator controls, staff awareness and privacy/security procedures;
- controlled physical access, secure retention and disposal of records; and
- incident identification, escalation, response and notification procedures.

POPIA requests

A data subject may direct a request for access to personal information, an objection to processing, or a request for correction or deletion to management@advisoroffice.com. The current POPIA forms and guidance are available from the Regulator's website. AO will deal with the request under POPIA, its Regulations and the applicable PAIA procedure.

Availability and maintenance

A copy of this manual is available free of charge on AO's website, for public inspection during normal business hours at AO's principal place of business, on request from management@advisoroffice.com, and to the Regulator on request. A reasonable reproduction or postage charge may apply where permitted by law.

The Information Officer will review this manual regularly and update it when there is a material change to AO's contact details, records, processing activities, recipients, transborder flows, security measures or applicable legal requirements.

END OF MANUAL