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PAIA MANUAL OF CURRENC GROUP

PREPARED IN TERMS OF SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT 2 OF 2000 (PAIA)

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1. INTRODUCTION

CurrenC Group (Pty) Ltd ("CurrenC Group") is a financial service provider operating in South Africa, offering a range of financial products and services, including but not limited to payment solutions, investment options, and financial advisory services. This manual is prepared in accordance with Section 51 of the Promotion of Access to Information Act 2 of 2000 ("PAIA"), which gives effect to the constitutional right of access to information held by private bodies, subject to justifiable limitations.

The purpose of this manual is to assist individuals or entities ("requesters") in understanding how to request access to records held by CurrenC Group, as required under PAIA.

2. CONTACT DETAILS OF CURRENC GROUP

Full Name of Entity: CurrenC Group (Pty) Ltd

Registration Number: 2019 / 458158 / 07

Physical Address: 5th Spaces Atrium on 9th floor, 5th Street, Sandton, Gauteng, 2196

Postal Address: 5th Spaces Atrium on 9th floor, 5th Street, Sandton, Gauteng, 2196

Telephone Number: 079 118 7478

Email Address: info@currenc.co.za

Website: www.currenc.co.za

Information Officer: Darius Kaunas

Email Address of Information Officer: darius@currenc.co.za

The Information Officer is responsible for handling requests for access to information under PAIA.

3. GUIDE ON HOW TO USE PAIA

The South African Human Rights Commission (SAHRC) has compiled a guide, as contemplated in Section 10 of PAIA, to assist persons in understanding and exercising their rights under the Act. From 1 July 2021, this function has been transferred to the Information Regulator, established under the Protection of Personal Information Act 4 of 2013 (POPIA).

The guide is available in all official languages of South Africa and can be accessed as follows:

Contact Details of the Information Regulator:

- **Physical Address:** JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
- **Telephone Number:** +27 10 023 5200

- **Email:** enquiries@info regulator.org.za
- **Website:** www.info regulator.org.za

Requesters are encouraged to consult this guide for additional information on the PAIA process.

4. RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION

CurrenC Group is required to keep certain records in terms of various pieces of South African legislation. These include, but are not limited to:

- Companies Act 71 of 2008
- Financial Advisory and Intermediary Services Act 37 of 2002 (FAIS)
- Financial Intelligence Centre Act 38 of 2001 (FICA)
- Income Tax Act 58 of 1962
- Protection of Personal Information Act 4 of 2013 (POPIA)
- Labour Relations Act 66 of 1995
- Basic Conditions of Employment Act 75 of 1997
- Electronic Communications and Transactions Act 25 of 2002

Records kept under these laws may be available to requesters, subject to the provisions of PAIA and any limitations imposed by the relevant legislation.

5. CATEGORIES OF RECORDS HELD BY CURRENC GROUP

CurrenC Group holds various categories of records, which may be requested under PAIA. These include, but are not limited to:

a. Corporate Records

- Memorandum of Incorporation
- Company registration documents
- Minutes of board meetings
- Shareholder records

b. Financial Records

- Annual financial statements
- Tax records
- Banking details and statements
- Audit reports

c. Human Resources Records

- Employee contracts and personnel files
- Payroll records
- Policies and procedures
- Training records

d. Client Records

- Client agreements and contracts
- Transaction records
- Personal information (subject to POPIA restrictions)

e. Operational Records

- Policies and procedures manuals
- Compliance records
- Risk management documentation

f. Marketing and Communications

- Marketing materials
- Website content
- Correspondence with clients and stakeholders

Note: Access to certain records, particularly those containing personal or confidential information, may be refused in terms of the grounds for refusal outlined in PAIA (e.g., protection of privacy, commercial confidentiality).

6. REQUEST PROCEDURE

To request access to a record held by CurrenC Group, the following steps must be followed:

1. Submission of Request:

- The requester must complete the prescribed Form 2 (Request for Access to Record), available from the Information Regulator's website or upon request from CurrenC Group.
- The completed form must be submitted to the Information Officer via email or physical delivery at the addresses provided in Section 2.

2. Details Required:

- The requester must provide sufficient particulars to enable the Information Officer to identify the record(s) requested and the requester's identity.
- Specify the form of access required (e.g., inspection, copies).

3. Processing of Request:

- CurrenC Group will process the request within 30 days of receipt, unless an extension is required as permitted under PAIA.
- The requester will be notified of the decision in writing.

4. Third-Party Notification:

- If the request involves records containing third-party information, CurrenC Group may notify the affected party, who may consent or object to the disclosure within the timeframes provided by PAIA.

7. FEES

- A request fee of R50.00 (excluding VAT) is payable by all requesters, except personal requesters (i.e., individuals requesting their own information).
- Additional access fees may apply for the reproduction, search, and preparation of records, as prescribed by PAIA regulations.
- The fee structure is available upon request from the Information Officer or on the Information Regulator's website.
- Fees must be paid before access is granted, unless waived by the Information Officer in exceptional circumstances.

8. REMEDIES AVAILABLE IF REQUEST IS REFUSED

If a request for access is refused, the requester may:

1. **Internal Appeal:** CurrenC Group does not have an internal appeal process as it is a private body.
2. **Application to Court:** The requester may apply to a court with jurisdiction for appropriate relief within 180 days of the refusal, as per Section 78 of PAIA.
3. **Complaint to Information Regulator:** The requester may lodge a complaint with the Information Regulator for investigation.

9. AVAILABILITY OF THE MANUAL

This manual is available:

- At CurrenC Group's physical address (see Section 2) during normal business hours;
- On CurrenC Group's website: www.currenc.co.za
- Upon request from the Information Officer;
- From the Information Regulator's office or website.

10. UPDATES TO THE MANUAL

This manual will be updated as necessary to reflect changes in CurrenC Group's operations, legal requirements, or contact details. The latest version will always be available as outlined in Section 9.

Signed:

Darius Kaunas

Information Officer

CurrenC Group (Pty) Ltd

Date: 04 March 2025