

PROMOTION OF ACCESS TO INFORMATION ACT MANUAL

Section 51 Manual in terms of the Promotion of Access to Information Act 2 of 2000 (PAIA)

Entity name	Synergy Business & Capital Advisory (Pty) Ltd
Registration number	2013/214011/07
Head of entity	Chris Maurice Kupsamy
Designated information officer	Chris Maurice Kupsamy
Physical address	Johannesburg, Gauteng, South Africa
Postal address	Johannesburg, Gauteng, South Africa
Email address	chrisk@sbcadvisory.co.za
Telephone number	+27 83 401 6593
Website	www.sbcadvisory.co.za
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Version	1.0

1. Introduction

This manual is published in terms of Section 51 of the Promotion of Access to Information Act 2 of 2000 (PAIA), as amended. PAIA gives effect to the constitutional right of access to information held by private bodies, where such access is required for the exercise or protection of any rights.

This manual serves to inform the public of the categories of records held by Synergy Business & Capital Advisory (Pty) Ltd (hereinafter referred to as "Synergy" or "the Company"), the procedure to be followed when requesting access to records, and the grounds on which access may be refused.

This manual is available at the registered address of the Company and on the Company's website at www.sbcadvisory.co.za.

2. The Information Regulator

The Information Regulator of South Africa oversees the administration of both PAIA and POPIA. Contact details are as follows:

Name	The Information Regulator (South Africa)
Physical address	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Postal address	P.O. Box 31533, Braamfontein, Johannesburg, 2017
Email (general enquiries)	inforeg@justice.gov.za
Email (complaints)	complaints.IR@justice.gov.za
Website	www.inforegulator.org.za

3. How to Request Access to Records

3.1 Form of Request

A request for access to records must be made on the prescribed form (Form C) as published in Government Gazette No. 23119 of 14 March 2002, or such other form as may be prescribed from time to time. The form is available from the Information Regulator's website and from the Company upon request.

3.2 How to Submit a Request

Completed request forms must be submitted to the Designated Information Officer:

- By email to: chrisk@sbcadvisory.co.za
- By post to: Chris Kupsamy, Synergy Business & Capital Advisory, Johannesburg, South Africa
- The subject line must read: "PAIA Access Request"

3.3 Request Fee

A requestor who is not a personal requester must pay a request fee as prescribed. The prescribed fee schedule is available from the Information Regulator. No request fee is payable by a personal requester (i.e. a requester who is seeking access to records about themselves).

3.4 Access Fee

If access to a record is granted, an access fee may be payable for reproduction of the record. The prescribed fee schedule applies.

3.5 Response Time

The Company will respond to a request within 30 days of receipt. This period may be extended by a further 30 days in exceptional circumstances, in which case the requestor will be notified in writing.

3.6 Grounds for Refusal

Access to records may be refused on the grounds set out in Chapter 4 of PAIA, including but not limited to:

- Mandatory protection of privacy of a third party who is a natural person
- Mandatory protection of commercial information of a third party
- Mandatory protection of certain confidential information of a third party
- Protection of safety of individuals
- Protection of research information
- Commercially sensitive information

4. Categories of Records Held

4.1 Corporate and Statutory Records

- Certificate of Incorporation
- Memorandum of Incorporation
- Company registration documents
- Share register and shareholder agreements
- Board resolutions and minutes
- Tax registration certificates and correspondence
- CIPC filings and annual returns

4.2 Financial Records

- Annual financial statements
- Management accounts
- Bank records and statements
- Invoices, receipts, and payment records
- Tax returns and supporting documentation
- Payroll records (if applicable)

4.3 Human Resources Records

- Employment contracts and consultant agreements
- Personal information of employees and contractors
- Performance records
- Leave records

4.4 Client and Engagement Records

- Client agreements and engagement letters
- Proposal documentation
- Work product and deliverables (subject to confidentiality obligations)
- Correspondence with clients
- Contact information of clients and prospects

4.5 Operational Records

- Supplier and vendor agreements
- Insurance policies
- Intellectual property documentation
- Website analytics data
- Contact form submissions
- Email correspondence

4.6 Records Held by Third Parties

Certain records relating to the Company may be held by third parties, including:

- Company secretarial service providers
- Auditors and tax practitioners
- Legal advisors
- Cloud service providers (email, document storage, website hosting)

5. Privacy and Personal Information

The Company processes personal information in accordance with the Protection of Personal Information Act 4 of 2013 (POPIA). The Company's full Privacy Notice is available on its website at www.sbcadvisory.co.za and upon request.

The Designated Information Officer is also responsible for compliance with POPIA and may be contacted at chrisk@sbcadvisory.co.za for any privacy-related enquiries or complaints.

6. Amendment of this Manual

This manual will be reviewed and updated as required, and at least annually. The most current version will always be available on the Company's website at www.sbcadvisory.co.za.

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