

TITANDC

PAIA Manual

Manual in terms of section 51 of the Promotion of Access to Information Act, 2 of 2000, read with the Protection of Personal Information Act, 4 of 2013

Version 2.0 · Approved 9 September 2026

1. Introduction

Titan Development Consultants (Pty) Ltd, trading as TitanDC, registration number 1999/021465/07, is a private body and an authorised financial services provider (FSP 8972). This manual is prepared in terms of section 51 of the Promotion of Access to Information Act, 2000 ("PAIA"), as amended by the Protection of Personal Information Act, 2013 ("POPIA"), and the Regulations published by the Information Regulator in 2021. It explains what records we hold, how to request access to them, and how we process personal information.

2. Contact details (section 51(1)(a))

	Detail
Head of the private body	Johan Geldenhuys, Managing Director
Information Officer	Johan Geldenhuys
Deputy Information Officer	Dean Geldenhuys
Street address	3 Tyger Lake, Office 518, Fifth Floor, 2 Niagara Road, Tygervally, Cape Town, 7530
Postal address	Same as the physical address
Telephone	021 200 4000
Email	reception@titandc.co.za
Website	www.titandc.co.za

3. The Guide on how to use PAIA and POPIA (section 51(1)(b))

The Information Regulator has published a Guide, in all official languages, on how to use PAIA and POPIA, including how to lodge a request and a complaint. The Guide is available on the Regulator's website and from its offices, and a copy may be inspected at our offices during office hours.

	Information Regulator (South Africa)
Address	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Postal address	P O Box 31533, Braamfontein, Johannesburg, 2017
Telephone	010 023 5200
Email	enquiries@inforegulator.org.za
Website	www.inforegulator.org.za

4. Records automatically available (section 51(1)(c) and 52(2))

The following records are available without a formal request: the content of our website, including our services, contact details, this manual, our Privacy Policy, our Conflict of Interest Management Policy, our Complaints Procedure and our Statutory Disclosure Notice; and brochures and product information supplied by product suppliers. No notice in terms of section 52(2) has been published.

5. Records available in terms of other legislation (section 51(1)(d))

Records may be available in terms of the following legislation, subject to the provisions of each Act:

- Basic Conditions of Employment Act, 75 of 1997
- Companies Act, 71 of 2008
- Compensation for Occupational Injuries and Diseases Act, 130 of 1993
- Consumer Protection Act, 68 of 2008
- Electronic Communications and Transactions Act, 25 of 2002
- Employment Equity Act, 55 of 1998
- Financial Advisory and Intermediary Services Act, 37 of 2002
- Financial Intelligence Centre Act, 38 of 2001
- Financial Sector Regulation Act, 9 of 2017
- Income Tax Act, 58 of 1962
- Insurance Act, 18 of 2017
- Labour Relations Act, 66 of 1995
- Long-term Insurance Act, 52 of 1998
- Medical Schemes Act, 131 of 1998
- Occupational Health and Safety Act, 85 of 1993
- Pension Funds Act, 24 of 1956
- Prevention of Organised Crime Act, 121 of 1998
- Protection of Personal Information Act, 4 of 2013
- Short-term Insurance Act, 53 of 1998
- Skills Development Act, 97 of 1998
- Skills Development Levies Act, 9 of 1999
- Unemployment Insurance Act, 63 of 2001
- Unemployment Insurance Contributions Act, 4 of 2002
- Value-Added Tax Act, 89 of 1991

6. Subjects and categories of records we hold (section 51(1)(e))

Subject	Categories of records
Company and governance	Incorporation documents, memorandum of incorporation, share register, minutes and resolutions of directors, statutory returns, B-BBEE certificate
FAIS licensing and compliance	FSP licence and product categories, register of key individuals and representatives, fit and proper records, compliance reports, professional indemnity and fidelity cover, conflict of interest register, complaints register, TCF assessments

Subject	Categories of records
Clients	Client register, identification and verification records, records of advice, mandates and fee agreements, policy schedules, correspondence, claims records, complaints
Product suppliers and partners	Intermediary, binder and outsourcing agreements, commission and fee statements, correspondence
Human resources	Employment contracts, personnel files, payroll, leave and disciplinary records, training and CPD records, policies and procedures
Finance	Accounting records, financial statements, bank records, tax returns, asset registers, insurance policies
Information technology	System and access records, security policies, backups, IT service agreements

7. Processing of personal information (section 51(1)(f) and POPIA)

7.1 Purpose of processing

We process personal information to give financial advice; to quote for, arrange, administer, renew and cancel insurance, medical scheme, investment and other financial products; to submit and manage claims; to verify identity and comply with the Financial Intelligence Centre Act; to keep the records required by FAIS and insurance legislation; to respond to enquiries and complaints; to manage employees and suppliers; and to protect our business and systems.

7.2 Categories of data subjects and of information

Data subjects	Personal information
Clients and prospective clients, and the persons insured or nominated under their policies	Identity and contact details, financial and banking details, assets and property, policy and claims history, records of advice and correspondence, and, where required for a product or claim, health information and information about offences
Trustees, directors and members of community schemes	Identity and contact details, scheme and building details, claims history
Employees, representatives and job applicants	Identity and contact details, qualifications and regulatory records, employment, remuneration and performance records, health information where relevant to employment
Suppliers and business partners	Contact details of representatives, contractual and payment details
Website visitors	Details submitted through the enquiry form; technical information recorded by hosting and security services

7.3 Recipients

Insurers, underwriting managers, medical schemes and other product suppliers and their service providers; Titan Direct (Pty) Ltd (registration number 2002/024096/07, FSP 48217), an associated company that administers certain policies under binder agreements with insurers; our compliance officers, auditors and professional advisers; IT, hosting and form service providers; credit bureaus and verification services; and regulators, ombud schemes, law enforcement and courts where the law requires.

7.4 Transfers outside South Africa

Cloud hosting and web services used by us may store information outside South Africa. Transfers take place only where the recipient is bound by law, binding corporate rules or contract to a level of protection

substantially similar to POPIA, or with the consent of the data subject.

7.5 Security measures

Role-based access to client information, individual logins with multi-factor authentication, secured cloud storage with off-site backup, locked physical storage and secure disposal, confidentiality obligations on staff and service providers, and regular staff training. Security is confirmed by our IT provider for our annual compliance review.

8. How to request access to a record (section 51(1)(g))

- 1 Complete the prescribed request form (Form 2 in the 2021 Regulations, reproduced as Annexure A) and send it to the Information Officer by email, post or hand delivery at the addresses in section 2. Give enough detail to identify the record and yourself, state the form of access you require, and state the right you seek to exercise or protect and why the record is required for that purpose.
- 2 If you request the record on behalf of someone else, attach proof of your authority.
- 3 A requester who asks for a record containing personal information about themselves pays no request fee. All other requesters pay the prescribed request fee before the request is processed. We will notify you of the fee, and of any deposit if the search is expected to take more than six hours.
- 4 We will decide on your request within 30 days of receiving a complete request and payment of the request fee. This period may be extended once by up to 30 days where the Act allows, and we will notify you of any extension.
- 5 If access is granted, we will tell you the access fee for reproduction and preparation, and provide access once it is paid. If access is refused, we will give the reasons and the provisions of the Act relied on, and tell you how to lodge a complaint with the Information Regulator or apply to court.
- 6 Access may be refused on the grounds in Chapter 4 of Part 3 of the Act, including where the record contains personal information about a third party, commercial or confidential information of a third party, information privileged in legal proceedings, or our own commercial information, unless disclosure is in the public interest as the Act defines it.

9. Fees (section 51(1)(g))

The fees below are those prescribed for private bodies in Annexure B of the Regulations relating to the Promotion of Access to Information, 2021.

Item	Fee
Request fee (not payable by a personal requester)	R100.00
Photocopy or printed copy of an A4 page or part thereof	R2.00
Copy in computer-readable form on a flash drive (supplied by the requester) or compact disc	R40.00
Transcription of visual images, per A4 page	R24.00
Copy of visual images	R60.00
Transcription of an audio record, per A4 page	R24.00
Copy of an audio record on a flash drive or compact disc	R40.00
Search for and preparation of the record, per hour or part of an hour	R145.00
Deposit where search and preparation will exceed six hours	One third of the access fee

Item	Fee
Postage	Actual cost

10. Availability of this manual (section 51(3))

This manual is available on our website, www.titandc.co.za, and for inspection at our offices during office hours free of charge. A copy has been submitted to the Information Regulator. The manual is reviewed annually and whenever our contact details, records or processing change.

Version control

Date	Version	Change	Approved by
September 2026	2.0	Current version, prepared under the 2021 Regulations and replacing the previous section 51 manual.	Johan Geldenhuys, Managing Director, on the recommendation of Masthead (compliance officers), 9 September 2026

Annexure A: Request for access to a record of a private body

Form 2 of the Regulations relating to the Promotion of Access to Information, 2021 (regulation 7).

Complete all sections in block letters and attach proof of identity and, if applicable, proof of authority to act on behalf of another person.

A. Particulars of the private body

Name	Titan Development Consultants (Pty) Ltd trading as TitanDC
Information Officer	Johan Geldenhuys
Address	3 Tyger Lake, Office 518, Fifth Floor, 2 Niagara Road, Tygervally, Cape Town, 7530
Email	reception@titandc.co.za

B. Particulars of the requester

Full names and surname

Identity number

Capacity in which the request is made, if on behalf of another person

Postal address

Telephone number

Email address

C. Particulars of the person on whose behalf the request is made (if applicable)

Full names and surname

Identity number

D. Particulars of the record

Description of the record or relevant part of the record

Reference number, if known

Any further particulars of the record

E. Fees

A request for access to a record other than a record containing personal information about yourself will be processed only after a request fee has been paid. You will be notified of the amount. The access fee

depends on the form of access and the time reasonably required to search for and prepare the record. If you qualify for exemption from any fee, state the reason:

Reason for exemption from payment of fees

F. Form of access to the record

Mark the appropriate box: copy of record; inspection of record; view images; copy of images; transcription of images; listen to soundtrack; transcription of soundtrack; printed copy of electronic record; copy in computer-readable form. If a disability prevents you from reading, viewing or listening to the record in the form provided, state the disability and the form required.

Form of access required

Disability, if any, and form in which the record is required

If a copy is requested, should it be posted to you? (Yes / No; postage is payable)

G. Particulars of the right to be exercised or protected

Indicate which right is to be exercised or protected

Explain why the record is required for the exercise or protection of that right

H. Notice of decision

How would you prefer to be informed of the decision (email, post, telephone)?

Signed at

Date

Signature of requester or person on
whose behalf the request is made