



# **Promotion of Access to Information Act (PAIA) Policy**

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### Versioning:

Version No.	Description	Author	Date
1.	Draft of policy	Diyuti Mohanlal	March 2026

## Mpowa Finance (Pty) Ltd - Promotion of Access to Information Act (PAIA) Manual

### 1. Introduction

This manual is prepared in terms of Section 51 of the Promotion of Access to Information Act, 2 of 2000 ("PAIA"). It explains how individuals and juristic persons can request access to information held by Mpowa Finance (Pty) Ltd ("Mpowa", "we", "our", or "us"), in compliance with PAIA and aligned with POPIA (Protection of Personal Information Act 4 of 2013).

### 2. Contact Information of the Information Officer

Role	Name	Contact Details
Information Officer	Mike Dewing	Email: data@mpowafin.co.za
Deputy Information Officer	Diyuti Mohanlal	Email: data@mpowafin.co.za

### 3. Guide to Requesting Access to Information

Any person who wishes to request access to records held by Mpowa may use the prescribed PAIA form, attached below.

Requests must:

- Be made in writing using the prescribed forms;
- Clearly identify the requester and, if applicable, the person on whose behalf the request is made;
- Specify the record(s) requested;
- Indicate the preferred format of access;
- Include the applicable request fee as determined by PAIA.

### 4. Categories of Records Held by Mpowa

Mpowa holds records related to its operations as a fintech/loan-broker, including but not limited to:

- Corporate Records:** Company registration documents, shareholder information, company policies.
- Customer Records:** Personal and financial information provided by customers, including loan applications, agreements, and transaction histories.
- Employee Records:** Employment contracts, payroll, performance, and training records.
- Operational Records:** Internal reports, risk assessments, compliance monitoring, and operational policies.
- Financial Records:** Accounting records, invoices, tax records, audit reports.
- Legal Records:** Legal opinions, correspondence, and contracts with third parties.

**Note:** Access to certain records may be restricted under PAIA or POPIA, including confidential commercial information, third-party personal information, and records protected by legal privilege.

## 5. Access Fees

We may charge fees in accordance with PAIA for:

- Requesting records;
- Searching, preparing, and reproducing records; and
- Providing copies in the requested format.

Fees will be communicated in advance, and access will be provided once payment is received.

## 6. Grounds for Refusal of Access

Mpowa may refuse access to requested records in accordance with PAIA and POPIA, including when:

- Disclosure would infringe the privacy of another individual;
- The record contains confidential commercial information;
- The record is subject to legal privilege;
- The request is manifestly frivolous or vexatious.

Where access is refused, the requester will be notified in writing with reasons and guidance on lodging an appeal.

## 7. Procedure for Lodging a Complaint

If a requester believes that access to information has been unreasonably refused, they may:

1. Submit a **notice of internal appeal** to Mpowa's Information Officer; or
2. Approach the **Information Regulator** under POPIA/PAIA.

## 8. Contact Information for the Information Regulator:

- Website: <https://www.justice.gov.za/infoereg>
- Email: [infoereg@justice.gov.za](mailto:infoereg@justice.gov.za)

## 9. Record-Keeping and Retention

Mpowa maintains records in line with:

- POPIA retention and security requirements;
- Internal record retention policies; and
- Legal or regulatory obligations.

Records may be retained electronically or physically, with restricted access based on operational and legal requirements.

## 10. Security and Confidentiality

Access to information is managed securely and confidentially. Only authorised staff members may handle requests.



Mpowa implements appropriate physical, technical, and administrative measures to safeguard records, particularly those containing personal or sensitive information.

#### **11. Third-Party Requests**

Where information contains personal or sensitive data about third parties, Mpowa will ensure compliance with POPIA and may seek consent from affected parties before granting access, except where disclosure is required by law.

*Legal Disclaimer This Policy may be updated at our discretion. Users are advised to review the latest version regularly*

# FORM 2

## 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 <i>(when made on behalf of another person)</i>			
Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B):		Facsimile: <input type="text"/>
	Cellular:		
Full names of person on whose behalf request is made <i>(if applicable)</i> :			
Identity Number			
Postal Address			

Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		
<b>PARTICULARS OF RECORD REQUESTED</b>			
<p><i>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.)</i></p>			
Description of record or relevant part of the record:			
Reference number, if available			
Any further particulars of record			
<b>TYPE OF RECORD</b> <i>(Mark the applicable box with an "X")</i>			
Record is in written or printed form			
Record comprises virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>			
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 <i>(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)</i>	
Written or printed transcription of virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
Transcription of soundtrack <i>(written or printed document)</i>	
Copy of record on flash drive <i>(including virtual images and soundtracks)</i>	
Copy of record on compact disc drive <i>(including virtual images and soundtracks)</i>	
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 <i>(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)</i>	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format <i>(including transcriptions)</i>	
E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language <i>(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)</i>	

**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:	

<b>FEEES</b>	
a)	<i>A request fee must be paid before the request will be considered.</i>
b)	<i>You will be notified of the amount of the access fee to be paid.</i>
c)	<i>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.</i>
d)	<i>If you qualify for exemption of the payment of any fee, please state the reason for exemption</i>
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 <i>(Please specify)</i>

Signed at \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ 20 \_\_\_\_\_

\_\_\_\_\_  
**Signature of Requester / person on whose behalf request is made**

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**FOR OFFICIAL USE**

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

\_\_\_\_\_  
**Signature of Information Officer**