

MANUAL PREPARED IN TERMS OF SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT, NO 2 OF 2000

July 2026

INTRODUCTION

The directors of Mamoru South Africa (Pty) Ltd (Mamoru) has tasked the Compliance Department to attend to all matters relating to the Promotion of Access to Information Act (“PAIA”).

PARTICULARS IN TERMS OF THE SECTION 51 MANUAL

This manual has been compiled in accordance with PAIA and applies to **Mamoru South Africa (Pty) Ltd**
(Registration number 2020/846611/07).

This manual is compiled in terms of section 51 of PAIA, as amended by the Protection of Personal Information Act 4 of 2013 (“POPIA”), and must be read together with the Guide issued by the Information Regulator in terms of section 10 of PAIA. Mamoru is a private body and a responsible party as those terms are defined in PAIA and POPIA respectively.

1. Contact details

Mamoru will deal with all requests relating to it. All requests for information in terms of this manual should be directed to:

Mamoru has designated an Information Officer and a Deputy Information Officer, who have been registered with the Information Regulator in terms of section 17 of PAIA read with section 56 of POPIA. Their particulars, together with those of the Head of the private body and the Chief Compliance Officer, are set out below:

Head of the private body – Chief Executive Officer: Ms Mui Ling (Daisy) Chiu – daisy.chiu@mamoru.com

Information Officer: Ms Viksha Maharaj – viksha.maharaj@mamoru.com

Deputy Information Officer: Mr Chris Li – chris.li@mamoru.com

Chief Compliance Officer: Mr Segabe Ditodi – segabe.ditodi@mamoru.com

Requests may be delivered, for the attention of the Information Officer, to:

Operating address

Spaces waterfall

1st Floor, Gateway West,

22 Magwa Cres,

Midrand,

2066

Registered address

West Tower 2nd FL,

Nelson Mandela Square - Maude Street,

Sandown,

Johannesburg,

Republic of South Africa

E-mail: compliance.africa@mamoru.com

2. Guide on how to use PAIA

The Information Regulator has, in terms of section 10(1) of PAIA, updated and made available a revised Guide on how to use PAIA (“Guide”) in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and the Protection of Personal Information Act 2 of 2013 (“POPIA”).

Should you require to exercise any right contemplated in PAIA and POPIA, we refer you to the Guide that has been updated and published by the Information Regulator in terms of section 10 of PAIA. It includes:

- a. what the objects of PAIA and POPIA are;
- b. the relevant contact details of each public and private body (where possible);
- c. the process that needs to be followed to request access to records;
- d. assistance available from the Information Regulator and Information Officers in terms of both PAIA and POPIA;
- e. how to get access to the manual of a private body;
- f. all the remedies available in law to you; and
- g. details on prescribed fees payable in respect of requests for information.

This Guide will be made available in such official language as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA.

Please direct any queries to:

Information Regulator Postal address:

JD House 27 Stiemens Street

Braamfontein

JOHANNESBURG

2001

Postal address: PO Box 31533, Braamfontein, Johannesburg, 2017

Telephone: 010 023 5200

Website: www.inforegulator.org.za

E-mail: enquiries@inforegulator.org.za

PAIA complaints e-mail: PAIAComplaints@inforegulator.org.za

POPIA complaints e-mail: POPIAComplaints@inforegulator.org.za

Registration of Information and Deputy Information Officers: Registration.IO@inforegulator.org.za

3. Disclosures required in terms of Section 51(1)(c) of PAIA insofar as POPIA is concerned

Mamoru will only collect, process and store personal information, with consent, and for legitimate purposes. This includes the following:

a. Categories of Data Subjects

Categories of Data Subjects	Personal Information that may be processed
Customers	Name and surname, nationality, address, contact details, registration numbers or identity numbers and date of birth, email address and bank details
Service Providers	Names, registration number, tax information, address, and bank details
Employees	Name, identity numbers, tax information, contact details, address, qualifications, gender and race

b. Purpose of processing

(i) Procurement of consent

This is where a data subject has consented to the processing of the personal information provided as part of onboarding or any subsequent instructions relating to the data subject's investment into our financial products and use of services. Mamoru is also required by law to collect certain personal information of its customers, the data subjects.

(ii) Fulfilment of our contract with our customers

This is where the processing of personal information is necessary for us to provide financial products and other services as agreed between us and our customers.

(iii) Compliance with legal obligations

This is where we need to process personal information to comply with any binding legal obligations imposed on us by the relevant governmental or regulatory authority.

(iv) Legitimate interests

Verification for the purposes of preventing and mitigating financial crimes, fraud or money laundering; Adhering to local and international best practice guidelines to safeguard our customer's investment into financial products and services offered by Mamoru; or performing the relevant IT due diligence testing to detect malicious data and cyber threats.

c. Recipients of personal information

Category of personal information	Personal Information that may be processed
Name and surname, identity number, digital fingerprints	As part of certain employment and other professional designations, Mamoru employees are compelled to have MIE background checks performed on them to verify and check the individual's criminal record by checking their prints against the Automated Fingerprint Identification. System database Personal Information may also be supplied, where necessary, to third party processors following the conclusion of a data protection agreement.
Qualifications, for qualification verifications	MIE
Credit and payment history, for credit information	MIE

d. Storage and destruction of personal information

We will retain personal customer information for the duration of the relationship between Mamoru and the customer in question. After a customer cease to be a customer, we may keep personal information up to a maximum period of five years to comply with retention requirements imposed by any law and for prudent record-keeping for the services rendered to you. Personal information may be retained for longer than five years, should it be the subject of any litigation or for other legal reasons. We may also keep personal information for research or statistical purposes with the necessary security controls in place.

e. General description of security measures

(i) Identity and Access management

Formal standards and procedures are defined and implemented covering all aspects of access management to minimise the risks associated with unauthorised or inappropriate access to applications and data.

(ii) Threat and Vulnerability management

Defined and documented processes to manage, monitor and respond to potential electronic threats and vulnerabilities are adopted and implemented.

Defined, documented and implemented incident management process that support the resolution and response to information security incidents are implemented.

(iii) Patch

management

Defined and documented process to implement and maintain preventive, detective and

corrective measures to protect technology systems and data from malicious software are developed.

f. Transborder flows of personal information

Mamoru operates as part of a group with affiliated entities and service providers in a number of jurisdictions. Where personal information is transferred to a third party (including an affiliate or operator) in a foreign country, Mamoru will only do so in accordance with section 72 of POPIA – that is, where the recipient is subject to a law, binding corporate rules or a binding agreement providing an adequate level of protection, where the data subject has consented, where the transfer is necessary for the performance or conclusion of a contract, or where the transfer is for the benefit of the data subject in the circumstances contemplated in that section.

4. Types of Records

a. Records available in terms of any other legislation

All records kept and made available in terms of legislation applicable to Mamoru in terms of this manual and the financial services industry in general, as it applies to Mamoru's specific environment in which Mamoru operates, are available in accordance with said legislation.

b. Records available without requesting access in terms of PAIA

A private body may, on a voluntary and periodic basis, submit to the Minister a description of categories of records, which are automatically available without a person having to request access in terms of PAIA. The Minister must publish any description so submitted by notice in the Gazette. Mamoru has not submitted any such description for publication in the Gazette. Certain records are however freely available on the Internet at www.mamoru.co.za

c. Records available on request

We set out below the subjects and categories of records that are, subject to access being denied as set out in PAIA, available upon request for the purposes of PAIA:

Records are held on the following subjects:

- Personnel records;
- Customer-related records;
- Private body records; and
- Records in the possession of or pertaining to other parties.

(i) Personnel records

Personnel refers to any person who works for or provides services to or on behalf of the private body and receives or is entitled to receive any remuneration and any other person who assists in carrying out or conducting the business of the private body. This includes, without limitation, directors, executives, non-executives, all permanent, temporary and parttime staff as well as contract workers.

(ii) Personnel records include the following:

- Any personal records provided to the private body by their personnel;

- Any records a third party has provided to the private body about any of their personnel;
- Conditions of employment and other personnel-related contractual and quasi-legal records;
- Internal evaluation records; and
- Other internal records and correspondence.

(iii) Customer related records

A customer includes any natural or juristic entity, who receives services from the private body.

Customer-related information includes the following:

- Any records a customer has provided to a third party acting for or on behalf of the private body;
- Any records a third party has provided to the private body; and
- Records generated by or within the private body pertaining to the customer, including transactional records.

(iv) Private body records

A private body's records relate to the body's own affairs and are considered to include, but not limit to:

- Financial records;
- Financial products records;
- Operational records;
- Databases;
- Information technology;
- Marketing records;
- Internal correspondence;
- Records relating to products and services;
- Statutory records;
- Internal policies and procedures;
- Treasury-related records;
- Securities and equities; and
- Records held by officials of the private body.

(v) Other parties

The private body may possess records pertaining to other parties, including without limitation contractors, suppliers, subsidiary/holding/sister companies, joint venture companies, service providers.

The following records fall under this category:

- Personnel, customer or private body records which are held by another party as opposed to being held by the private body; and
- Records held by the private body pertaining to other parties, including without limitation financial records, correspondence, contractual records, records provided by the other party, and records third parties have provided about the contractors / suppliers.

5. Requesting procedures

A person who wants access to the records of any of the identified private bodies must complete the necessary request form. The request form can be accessed on www.mamoru.co.za or www.inforegulator.org.za. If a person needs assistance to obtain the form or on any other matter, please contact the Information Officer at the email address provided in paragraph 1. The completed request form must be sent to the address or email address provided in paragraph 1 and marked for the attention of the Head of Compliance. The Head of Compliance will process the request and inform the requester of the fees (if any) that are payable and of the different procedures that must be followed until the request is finalised. A copy of the fee structure applicable to private bodies can be accessed on www.mamoru.co.za. All the pertinent sections of the request form must be completed fully, failing which the process will be delayed while the Head of Compliance obtains such additional information.

A request for access to a record of Mamoru must be made on the prescribed form (Form 2 of the Regulations relating to the Promotion of Access to Information, 2021) and must be addressed to the Information Officer at the address or e-mail address set out in paragraph 1. The requester must provide sufficient particulars to enable the Information Officer to identify the record and the requester, must indicate the form of access required, and must specify the right the requester seeks to exercise, together with an explanation of why the requested record is required for the exercise or protection of that right.

The Information Officer will decide on the request within 30 days of receipt (subject to any extension permitted under section 57 of PAIA) and will notify the requester of the decision, the applicable fees and the procedure to be followed. A requester may be required to pay the prescribed request fee before the request is processed, and an access fee (including reproduction and, where applicable, search and preparation costs) before access is given, as provided for in section 54 of PAIA and the prescribed tariff of fees in the Regulations.

NOTE: Access to certain records may be or must be denied on the grounds set out in PAIA.

Mandatory grounds for refusal include, but are not limited to:

- Information for the protection of the privacy of individuals;
- Information for the protection of commercial information and confidential information of third parties;
- Information privileged from production in legal proceedings;
- Commercial information of the company; and
- Research information.

6. Requests in terms of POPIA

In addition to the right of access to records under PAIA, a data subject has the right under POPIA to request confirmation of whether Mamoru holds personal information about the data subject, to request access to that personal information, and to request the correction, destruction or deletion of personal information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully, in terms of sections 23 and 24 of POPIA.

A request for access to personal information in terms of POPIA must be made on the prescribed form and directed to the Information Officer using the contact details in paragraph 1. A request for correction or deletion must be made on Form 2 prescribed under the POPIA Regulations, 2018. A data subject may also object, on reasonable grounds, to the processing of personal information as contemplated in section 11(3) of POPIA.

7. Remedies and complaints to the Information Regulator

If a requester is dissatisfied with the way in which a request has been dealt with, the requester may lodge a complaint with the Information Regulator in the prescribed manner in terms of section 77A of PAIA, or apply to a court for appropriate relief in terms of section 78 of PAIA, within the periods prescribed. A data subject who is aggrieved by the alleged interference with the protection of their personal information may submit a complaint to the Information Regulator in terms of section 74 of POPIA. The contact details of the Information Regulator appear in paragraph 2.

8. Availability of the manual

Copies of this manual are available for inspection, free of charge, at the offices of Mamoru South Africa (Pty) Ltd. Copies are also available on our website (www.mamoru.co.za)