



PAIA MANUAL



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1 INTRODUCTION

All references in this Manual are to VALOR MARKETS (PTY) LTD, a company incorporated in South Africa and licensed as an authorised Financial Services Provider by the FSCA under licence number 54447. This Manual does not apply to VALOR MARKETS LTD, incorporated in the Union of the Comoros, which is a separate legal entity that provides client onboarding, trading execution, and custody of funds.

2 LIST OF ACRONYMS AND ABBREVIATIONS

- 2.1 “**Minister**” means Minister of Justice and Correctional Services of the Republic of South Africa;
- 2.2 “**PAIA**” means the Promotion of Access to Information Act No. 2 of 2000 (as Amended);
- 2.3 “**POPIA**” means the Protection of Personal Information Act No. 4 of 2013;
- 2.4 “**Regulator**” means the Information Regulator; and
- 2.5 “**Republic**” means the Republic of South Africa.

2 PURPOSE OF THE PAIA MANUAL

- 2.1 This PAIA Manual serves as a resource to members of the public, providing transparency and clarity regarding the records held by VALOR MARKETS (PTY) LTD (hereinafter referred to as “**the Company**”) in its capacity as an FSCA-licensed intermediary.
- 2.2 The Manual provides the following functions:
 - i. It explains which categories of records are maintained by the Company that may be accessed without a formal PAIA request.
 - ii. It provides guidance on how to submit formal PAIA requests for access to information.



- iii. It clarifies which records are accessible under other legislation and the procedures to obtain them.
- iv. It identifies the contact details of the Information Officer and Deputy Information Officer of the Company.
- v. It outlines whether personal information is processed by the Company, the purposes of such processing, and the categories of data subjects concerned.
- vi. It explains the measures in place to protect personal information.

2.3 This Manual applies exclusively to records and information processed by VALOR MARKETS (PTY) LTD as a South African intermediary. It does not extend to information or records held by VALOR MARKETS LTD (Union of the Comoros), which are subject to Comorian law and its own regulatory framework.

3 KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF VALOR MARKETS (PTY) LTD

All PAIA and POPIA-related requests directed at VALOR MARKETS (PTY) LTD must be addressed to the Company's designated Information Officer or Deputy Information Officer.

Email:	support@valormarkets.com
Website:	https://www.valormarkets.com/

These contact details are to be used exclusively for matters concerning South African access to information legislation. Requests relating to trading accounts, deposits, withdrawals, or services rendered by VALOR MARKETS LTD must be directed to that entity's channels.

4 GUIDE ON HOW WE USE PAIA

4.1 The Information Regulator has published a Guide in terms of section 10(1) of PAIA to assist individuals in exercising their rights under PAIA and POPIA.

4.2 This Guide may be obtained from the Information Regulator at <https://www.justice.gov.za/infoereg/> or by request to the Regulator directly.



- 4.3 A copy of the Guide is available for inspection in English during office hours at the registered office of VALOR MARKETS (PTY) LTD.

5 CATEGORIES OF RECORDS AVAILABLE WITHOUT A FORMAL REQUEST

- 5.1 The following categories of records are available without the need to submit a PAIA request:

- i. **Public Affairs:** Public product information, media releases.
- ii. **Marketing:** Market information.
- iii. **Corporate Governance:** Policies relevant to intermediary services.
- iv. **Operations:** Communication and contact details.
- v. **Information Technology:** General corporate information and resources.

- 5.2 For the avoidance of doubt, this does not include client trading or account-related records, which are held and maintained by VALOR MARKETS LTD.

6 LEGISLATION APPLICABLE TO VALOR MARKETS (PTY) LTD

CATEGORY OF RECORDS	APPLICABLE LEGISLATION
Memorandum of incorporation	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000
Employment Equity Act	No 55 of 1998
Income Tax Act	No 95 of 1967
Labour Relations Act	No 66 of 1995
Value Added Tax Act	No 89 of 1991
Financial Advisory and Intermediary Services Act	No 37 of 2002
Basic Conditions of Employment Act	No 75 of 1997
Electronic Communications and Transactions Act	No 25 of 2002
Promotion of Access of Information Act	No 2 of 2000
Unemployment Insurance Act	No 30 of 1996



Disaster Management Act	No 57 of 2002
Financial Institutions (Protection of Funds) Act	No 28 of 2001
Financial Intelligence Centre Act	No 38 of 2001
Financial Markets Act	No 19 of 2012
Financial Sector Regulation Act	No 9 of 2017
Financial Services Board Act	No 97 of 1990
Financial Services Ombud Schemes Act	No 37 of 2004
Occupational Health and Safety Act	No 85 of 1993
Prevention and Combating of Corrupt Activities Act	No 12 of 2004
Prevention of Organized Crime Act	No 121 of 1998
Promotion of Equality and Prevention of Unfair Discrimination Act	No 4 of 2000
Protection of Constitutional Democracy Against Terrorist and Related Activities Act	No 33 of 2004
Protection of Personal Information Act	No 4 of 2013

7 **SUBJECTS AND CATEGORIES OF RECORDS HELD**

7.1 The Company maintains the following records relevant to its intermediary functions:

- i. **Strategic Documents:** Annual reports, strategic plans, annual performance plans.
- ii. **Human Resources:** Policies and procedures, advertised posts, employee records.
- iii. **Compliance and Governance:** FSCA correspondence, FICA compliance records, intermediary agreements.

7.2 Trading, custody, deposit, and withdrawal records are expressly excluded from this list, as they are maintained by Valor Markets Ltd



8 PROCESSING OF PERSONAL INFORMATION

8.1 PURPOSE OF PROCESSING PERSONAL INFORMATION

VALOR MARKETS (PTY) LTD processes personal information solely to comply with its obligations under FAIS, FICA, POPIA, and related South African legislation. This includes verifying representatives and affiliates, ensuring compliance with intermediary requirements, and monitoring for potential misconduct within its regulated role. The Company does not process personal information relating to client account opening, custody of funds, or trading activity, as these functions are performed by VALOR MARKETS LTD.

8.2 CATEGORIES OF DATA SUBJECTS

The following categories of data subjects apply:

- i. Customers and Clients (South African intermediated relationships only): name, contact details, identification number, and referral records.
- ii. Service Providers: names, registration numbers, addresses, and financial details.
- iii. Employees: personal details, qualifications, demographic information.

8.3 RECIPIENTS OF PERSONAL INFORMATION

8.3.1 The Company may disclose personal information to:

- i. The South African Police Service, for criminal background checks.
- ii. The South African Qualifications Authority, for verification of qualifications.
- iii. Credit bureaus, for credit and payment history checks.



8.3.2 Such disclosures are limited to the Company's obligations as an FSCA-regulated intermediary.

8.4 SECURITY MEASURES

The Company implements appropriate technical and organisational measures, including data encryption, secure access protocols, antivirus and anti-malware protections, and restricted access to confidential records, in order to safeguard the confidentiality, integrity, and availability of information under its control.

9 AVAILABILITY OF THE MANUAL

This Manual is available in the following locations:

- i. On the Company's website; and/or
- ii. From the Compliance Department upon request.

10 UPDATES AND AMENDMENTS

The Compliance Department of VALOR MARKETS (PTY) LTD shall review this Manual annually, or more frequently if required by legislative or organisational changes. Amendments will be made promptly where necessary to ensure continued compliance with South African law and best practice.
