



PAIA MANUAL

REAL VIRTUAL ASSET VENTURE (PTY) LTD

Registration Number: 2024/767369/07

*Prepared in terms of Section 51 of the Promotion of
Access to Information Act, 2 of 2000 (as amended)*

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1. INTRODUCTION

This Manual has been prepared in accordance with Section 51 of the Promotion of Access to Information Act, 2000 ("PAIA") and addresses the requirements of the Protection of Personal Information Act, 2013 ("POPIA").

The purpose of this Manual is to facilitate requests for access to records held by Real Virtual Asset Venture (Pty) Ltd and to provide information regarding the processing of personal information.



2. COMPANY INFORMATION

Company Name: Real Virtual Asset Venture (Pty) Ltd

Registration Number: 2024/767369/07

Physical Address:

81 Featherview Estate,
Falls Road,
Krugersdorp, 1739

Postal Address:

81 Featherview Estate,
Falls Road,
Krugersdorp, 1739

Telephone: 066 222 4827

Email: rvav2@fincor.ai

3. INFORMATION OFFICER

Information Officer

Name: Armin Bartholoma

Designation: Director and Information Officer

Telephone: 066 222 4827

Email: rvav2@fincor.ai

Deputy Information Officer

No Deputy Information Officer has currently been appointed.

4. GUIDE ON HOW TO USE PAIA

The Information Regulator has compiled a guide explaining how to use PAIA and POPIA.

The guide is available from:

Information Regulator (South Africa)

JD House
27 Siemens Street
Braamfontein
Johannesburg

Website: <https://www.inforegulator.org.za>

Email: enquiries@inforegulator.org.za



5. RECORDS AVAILABLE WITHOUT FORMAL REQUEST

The following records may be made available without a formal PAIA request:

Category	Available Upon Request
PAIA Manual	Yes
Privacy Notice	Yes
Complaints Procedure	Yes
Terms and Conditions	Yes
Public Regulatory Disclosures	Yes
Company Registration Documents	Yes

6. RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION

Real Virtual Asset Venture maintains records in accordance with applicable legislation, including:

- Promotion of Access to Information Act, 2000;
- Protection of Personal Information Act, 2013;
- Financial Intelligence Centre Act, 2001;
- Companies Act, 2008;
- Tax Administration Act, 2011;
- Income Tax Act, 1962;
- Electronic Communications and Transactions Act, 2002;
- Consumer Protection Act, 2008;
- Financial Advisory and Intermediary Services Act, 2002 (where applicable);
- Regulations, Directives and Guidance Notes issued by the Financial Intelligence Centre;
- Regulations and requirements applicable to Crypto Asset Service Providers.



7. CATEGORIES OF RECORDS HELD

7.1 Corporate Records

- Memorandum of Incorporation;
- Share Registers;
- Director Registers;
- Board Resolutions;
- Statutory Returns;
- Governance Documents.

7.2 Financial Records (where applicable)

- Accounting Records;
- Financial Statements;
- Tax Records;
- Invoices;
- Bank Statements;
- Audit Reports.

7.3 Human Resources Records (where applicable)

- Employment Contracts;
- Personnel Files;
- Payroll Records;
- Leave Records;
- Training Records.

7.4 Client Records

- Client Agreements;
- Customer Due Diligence Records;
- Identity Verification Documents;
- Proof of Address Records;
- Source of Funds Documentation;
- Source of Wealth Documentation;
- Transaction Records;
- Wallet Verification Records;
- Correspondence.

7.5 Compliance Records

- Risk Management and Compliance Programme (RMCP);
- AML/CFT Policies;
- Sanctions Screening Results;
- Politically Exposed Person Screening Results;
- Adverse Media Screening Results;
- Compliance Monitoring Reports;
- Internal Audit Reports;
- Regulatory Reporting Records;
- Suspicious and Unusual Transaction Reporting Records (where applicable).

7.5.1 Crypto Asset Records

Real Virtual Asset Venture may maintain records relating to crypto asset transactions and compliance obligations, including:

- Wallet ownership verification records;
- Virtual Asset Service Provider (VASP) identification records;
- Transaction monitoring records;
- Exchange confirmations and settlement records;
- Records relating to suspicious and unusual transaction monitoring.



7.6 Technology and Security Records

- Access Logs;
- Information Security Policies;
- Incident Reports;
- Backup Records;
- Business Continuity Plans;
- Cybersecurity Assessments.

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing

Real Virtual Asset Venture may process personal information for the following purposes:

8.1.1 Customer Onboarding

To identify and verify clients in accordance with legal and regulatory obligations.

8.1.2 Provision of Services

To facilitate crypto asset transactions, payment services, customer support and related business activities.

8.1.3 Regulatory Compliance

To comply with obligations under applicable legislation, including anti-money laundering and counter-terrorist financing requirements.

8.1.4 Risk Management

To assess, monitor and manage legal, financial, operational and compliance risks.

8.1.5 Fraud Prevention

To detect, investigate and prevent fraud, financial crime, sanctions breaches and other unlawful activities.

8.1.6 Business Operations

To conduct internal administration, reporting, auditing, training and service improvement activities.

8.1.7 Marketing

Where lawful consent has been obtained, to provide clients with information regarding products and services.

8.2 Categories of Data Subjects

Real Virtual Asset Venture may process personal information relating to:

- Prospective Clients;
- Clients;
- Directors;
- Shareholders;
- Beneficial Owners;
- Employees;
- Contractors;
- Service Providers;
- Representatives;
- Juristic Representatives; and
- Regulatory Authorities.

8.3 Categories of Personal Information

The following categories of personal information may be processed:

- Full Names;
- Identity Numbers;
- Passport Numbers;
- Dates of Birth;



- Contact Details;
- Residential Addresses;
- Employment Information;
- Financial Information;
- Tax Information;
- Company Registration Information;
- Beneficial Ownership Information;
- Wallet Addresses;
- Transaction Information; and
- Compliance Screening Results.

8.4 Recipients of Personal Information

Personal information may be disclosed to:

- Regulatory Authorities;
- Financial Intelligence Centre;
- Financial Sector Conduct Authority;
- South African Revenue Service;
- Banking Institutions;
- Payment Service Providers;
- Identity Verification Providers;
- Compliance Service Providers;
- Legal Advisors;
- Auditors; and
- Law Enforcement Agencies where required by law.

8.4.1 Third-Party Service Providers

Real Virtual Asset Venture may engage third-party service providers to assist with:

- Identity verification;
- Customer due diligence;
- Sanctions screening;
- Politically exposed person screening;
- Adverse media screening;
- Fraud prevention;
- Payment processing;
- Cloud hosting;
- Cybersecurity monitoring;
- Regulatory compliance;
- Record retention and storage; and
- Customer onboarding services.

Such service providers are contractually required to maintain appropriate confidentiality and security safeguards.

8.5 Transborder Information Flows

Personal information may be processed or stored outside South Africa where cloud service providers, compliance service providers, payment processors, crypto asset service providers or legal obligations require such processing.

Real Virtual Asset Venture will take reasonable measures to ensure that such transfers comply with POPIA.



8.5.1 International Service Providers

Where Real Virtual Asset Venture utilises international service providers, cloud hosting environments, compliance platforms, crypto asset exchanges, Travel Rule solutions or identity verification providers, personal information may be processed outside the Republic of South Africa.

Real Virtual Asset Venture will take reasonable measures to ensure that such processing complies with the requirements of POPIA and that adequate safeguards are implemented to protect personal information.

8.6 Information Security Measures

Real Virtual Asset Venture implements reasonable technical and organisational measures including (if applicable):

- Multi-Factor Authentication;
- Role-Based Access Controls;
- Secure Password Policies;
- Firewall Protection;
- Anti-Malware Protection;
- Secure Backups;
- Audit Logging;
- Staff Awareness Training;
- Incident Response Procedures;
- Vendor Due Diligence;
- Physical Security Controls;
- Access Review Procedures;
- Device and Endpoint Security Controls;
- Business Continuity and Disaster Recovery Procedures; and
- Periodic Information Security Assessments.
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8.7 Retention of Records

Real Virtual Asset Venture retains records in accordance with applicable legislation and business requirements.

Record Type	Minimum Retention Period
FICA Records	5 Years
Customer Due Diligence Records	5 Years
Transaction Records	5 Years
Tax Records	5 Years
Employment Records	As required by labour legislation
Corporate Records	As required by the Companies Act
Compliance Records	5 Years or longer where required

Records may be retained for longer periods where required by law, regulatory requirements, contractual obligations or ongoing investigations.



8.8 Complaints Relating to Personal Information

Any person who believes that Real Virtual Asset Venture has processed personal information contrary to applicable law may lodge a complaint with the Information Officer.

If the matter cannot be resolved internally, a complaint may be submitted to:

Information Regulator (South Africa)

JD House
27 Stiemens Street
Braamfontein
Johannesburg

Website: <https://www.inforegulator.org.za>

Email: complaints.IR@justice.gov.za

9. REQUEST PROCEDURE AND FEES

Requests for access to records must be submitted to the Information Officer using the prescribed PAIA request form.

The requester must:

- Complete the prescribed form;
- Provide sufficient detail to identify the requested records;
- Provide proof of identity where applicable; and
- Pay any prescribed request or access fees where applicable.

Request fees and access fees shall be charged in accordance with the Regulations published under the Promotion of Access to Information Act, as amended from time to time.

10. AVAILABILITY OF THIS MANUAL

This Manual is available:

- At the registered offices of Real Virtual Asset Venture (Pty) Ltd;
- Upon request from the Information Officer; and
- Upon request from the Information Regulator.

11. UPDATING OF THIS MANUAL

This Manual will be reviewed and updated periodically to ensure compliance with applicable legislation, regulatory requirements and business operations.