



WhatsApp Communication Risk Audit

Audit reference: SAMPLE-ACME-2026-07

Generated: 2026-07-31

Compliance-informed flagging of WhatsApp client conversations. POPIA-aligned, FAIS & FIC aware.

Executive summary

Conversations analysed: 8
Messages reviewed: 642
Flagged communications: 6

Severity breakdown

High: 3
Medium: 2
Low: 1

Compliance posture

Material risks detected. The flagged items include a potential FIC tip-off disclosure and guaranteed-returns promises — both warrant immediate compliance review.

Most common risk categories

guaranteed_returns — 1
unlicensed_advice — 1
sensitive_info — 1
tip_off_risk — 1
missed_deadline — 1
unprofessional_tone — 1

High severity (3)

1. [ZA-R007] tip_off_risk

Severity: High • Source: WhatsApp Chat - Client A • Sender: advisor • 2026-06-04

“Look, between us — the bank has flagged this transfer and I wouldn’t be surprised if a report goes in. Just move the money sooner rather than later.”

Remediation

Never disclose that a Suspicious Transaction Report has been or may be filed — this is a criminal offence under FIC s29(3)-(4).

2. [ZA-R001] guaranteed_returns

Severity: High • Source: WhatsApp Chat - Client B • Sender: advisor • 2026-06-11

“Put your money in the Growth Fund — you’re guaranteed at least 12% in the first year, no downside. I wouldn’t steer you wrong.”

Remediation

Avoid promises or implications of guaranteed returns; include the required performance disclaimers on any forward-looking claim.

3. [ZA-R004] sensitive_info

Severity: High • Source: WhatsApp Chat - Client C • Sender: advisor • 2026-06-18

“Send me your ID number and the banking details here on WhatsApp so I can set up the debit order today.”

Remediation

Never share ID or bank details over WhatsApp without verifying identity and using a secure channel; collect sensitive data via verified means only.

Medium severity (2)

1. [ZA-R002] unlicensed_advice

Severity: Medium • Source: WhatsApp Chat - Client B • Sender: advisor • 2026-06-23

"I'd recommend switching your retirement annuity to the offshore portfolio — it's the right call for your profile."

Remediation

State your FSP number and licence status before any product recommendation; document a needs analysis and suitability basis.

2. [ZA-R005] missed_deadline

Severity: Medium • Source: WhatsApp Chat - Client A • Sender: advisor • 2026-06-27

"I'll call you back tomorrow morning to confirm the documents are through — promise."

Remediation

Log the promise and set a follow-up; confirm the client instruction was actioned and record the outcome.

Low severity (1)

1. [ZA-R006] unprofessional_tone

Severity: Low • Source: WhatsApp Chat - Client C • Sender: advisor • 2026-07-02

"That's really not my problem, you'll just have to wait like everyone else."

Remediation

Maintain a professional tone; acknowledge the client and escalate within the firm rather than dismissing concerns.

Regulatory rule reference

ZA-R001 — guaranteed_returns

Promises or implications of guaranteed investment returns, or performance claims without required disclaimers

ZA-R002 — unlicensed_advice

Product recommendations, needs analysis, or financial advice without proper disclosure of licence status or suitability basis

ZA-R003 — complaint

Client expressing dissatisfaction, frustration, or intent to escalate to ombud/regulator

ZA-R004 — sensitive_info

Sharing of sensitive personal information (ID numbers, bank details, medical info) without proper verification or security measures

ZA-R005 — missed_deadline

Promises, commitments, or client instructions that require follow-up. ****Flag type: Promise**** — detects the promise/instruction, not fulfilment. Officer manually verifies outcome.

ZA-R006 — unprofessional_tone

Communications that are dismissive, rude, overly casual, or fail to meet professional standards expected of an FSP representative

ZA-R007 — tip_off_risk

Any indication that a suspicious transaction report (STR) has been or will be filed, or disclosure of AML/CFT investigation activity to the client

ZA-R008 — consent_gap

Processing, archiving, or sharing personal information without clear lawful basis, consent mechanism, or transparency

Disclaimer

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