



REAM[®]

INSURANCE BROKERS (PTY) LTD EST 1989

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This manual was prepared in accordance with section 51 of the Promotion of Access to Information Act, 2000 and to address requirements of the Protection of Personal Information Act, 2013.

Director: R.V. du Plessis A.C.I.I A.I.I.S.A Chartered Insurance Practitioner (CEO)

Physical Address: Unit 2, 86 Regency Drive, Route 21 Corporate Park, Centurion, 0178

Postal Address: Postnet Suite 175, Private Bag X1, Woodhill, 0076

Email: info@tuffstuff.co.za

Tel : 0861 44 44 00 | **Fax :** 011 394 8917

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2. Background to the Promotion of Access to Information Act

- 2.1.** The Promotion of Access to Information Act, No. 2 of 2000 (hereinafter referred to as “PAIA”) was enacted on 3 February 2000, giving effect to the Constitutional right in terms of section 32 of the Bill of Rights contained in the Constitution of the Republic of South Africa 108 of 1996 (the “Constitution”) of access to any information held by the state and any information that is held by another person and that is required for the exercise or protection of any rights.
- 2.2.** In terms of section 51 of PAIA, all Private Bodies are required to compile an Information Manual (“PAIA Manual”).

- 2.3.** Where a request is made in terms of PAIA, the body to whom the request is made is obliged to release the information, subject to applicable legislative and / or regulatory requirements, except where PAIA expressly provides that the information may be adopted when requesting information from a public or private body.

3. REAM Insurance Brokers (Pty) Ltd

- 3.1.** REAM Insurance Brokers (Pty) Ltd (hereinafter referred to as “REAM”) is a non-mandated short term insurance brokerage and hold a binder agreement with Western National Insurance Co Ltd.

- 3.2.** This PAIA Manual of REAM is available at its premises: Unit 2, 86 Regency Drive, R21 Corporate Park, Irene, 0078. The manual can also be accessed via our website: <https://www.reambrokers.co.za>

- 3.3.** Company Contact details are as follows:

CEO:	RV du Plessis
Office Manager:	A du Plessis
Postal Address:	Private Bag 105, Woodhill x1, Pretoria, 0078
Physical Address:	Unit 2, 86 Regency Drive, R21 CorporatePark, Irene, 0078
Telephone number:	011 394 8235
Email address:	info@reambrokers.co.za

4. Purpose of the PAIA Manual

- 4.1.** The purpose of PAIA is to promote the right of access to information, to foster a culture of transparency and accountability within REAM by giving the right to information that is required for the exercise or protection of any right and to actively promote a society in which the people of South Africa have effective access to information to enable them to exercise and protect their rights.
- 4.2.** In order to promote effective governance of private bodies, it is necessary to ensure that everyone is empowered and educated to understand their rights in relation to public and private bodies.
- 4.3.** Section 9 of PAIA recognises that the right to access information cannot be unlimited and should be subject to justifiable limitations, including, but not limited to:
- 4.3.1. Limitations aimed at the reasonable protection of privacy;
 - 4.3.2. Commercial confidentiality; and
 - 4.3.3. Effective, efficient and good governance;

and in a manner which balances that right with any other rights, including such rights contained in the

Bill of Rights in the Constitution.

- 4.4.** This PAIA Manual complies with the requirements of guide mentioned in section 10 of PAIA and recognises that upon commencement of the Protection of Personal Information Act 4 of 2013 (hereinafter referred to as "POPIA"), that the appointed Information Regulator will be responsible to regulate compliance with PAIA and its regulations by private and public bodies.
- 4.5.** PAIA grants a requester access to records of a private body, if the record is required for the exercise or protection of any rights. If a public body lodges a request, the public body must be acting in the public interest.
- 4.6.** Requests in terms of PAIA shall be made in accordance with the prescribed procedures, at the rates provided. The forms and tariff are dealt with in paragraphs 6 and 7 of PAIA.
- 4.7.**

Contact body:	The Information Regulator (South Africa)
Physical Address:	Head Office 27 Stiemens Street, Braamfontein, Johannesburg
Postal Address:	PO Box 31533, Braamfontein, Johannesburg, 2017
Telephone Number:	+27 11 877 3600
E-Mail:	infoereg@justice.gov.za
Web Site:	https://www.justice.gov.za/infoereg/index.html

5. Contact Details of the Managing Director

Managing Director:	Raymond Valentine du Plessis
Registered Address:	Unit 2, 86 Regency Drive, R21 Corporate Park, Irene, 0078
Postal Address:	As above
Telephone	+27 11 394 8235

Number:	
Website:	https://www.reambrokers.co.za

6. The Information Officer

- 6.1.** PAIA prescribes the appointment of an Information Officer for public bodies where such Information Officer is responsible to, inter alia, assess request for access to information. The head of a private body fulfils such a function in terms of section 51. REAM has opted to appoint an Information Officer to assess such a request for access to information as well as to oversee its required functions in terms of PAIA.
- 6.2.** The Information Officer appointed in terms of PAIA also refers to the Information Officer as referred to in POPIA. The Information Officer oversees the functions and responsibilities as required for in terms of both PAIA as well as the duties and responsibilities in terms of section 55 of POPIA after registering with the Information Regulator.
- 6.3.** The Information Officer may appoint, where it is deemed necessary, Deputy Information Officers, as allowed in terms of section 17 of PAIA as well as section 56 POPIA. This is in order to ensure accessibility to REAM for requesters of its records and to ensure fulfillment of its obligations and responsibilities as prescribed in terms of section 55 of POPIA. All request for information in terms of PAIA and POPIA must be addressed to the Information Officer.
- 6.4.** Despite the above-mentioned designation of a Deputy Information Officer(s), an Information Officer retains the accountability and responsibility for the functions delegated to the Deputy Information Officer.

Contact Details of the Information Officer

Information Officer:	Raymond Valentine Du Plessis
Physical Address:	Unit 2, 86 Regency Drive, R21 Corporate Park, Irene, 0078
Telephone Number:	+27 11 394 8235
Email:	raymond@tuffstuff.co.za

Contact Details of the Deputy Information Officer

Information Officer:	Andre Du Plessis
Physical Address:	Unit 2, 86 Regency Drive, R21 Corporate Park, Irene, 0078
Telephone Number:	+27 11 394 8235
Email:	andre@tuffstuff.co.za

6.5. Duties of the information officer under PAIA include:

- encourage and ensure compliance with PAIA in accordance with the body's definition of compliance,
- create, maintain and update a PAIA Manual for the body,
- evaluate and approve requests for access to information received in terms of the grounds set out in PAIA, within the time constraint or any extended period.

6.6. Duties of the information officer under POPIA is set out in S(1) and includes:

- Encourage compliance with conditions for the lawful processing of personal information,
- Deal with requests made pursuant to POPIA (presumably by the Information Regulator or data subjects),
- Work with the Regulator in relation to investigations conducted
- Otherwise ensure compliance by the body with the provisions of POPIA,
- Develop, implement and monitor a compliance framework
- Ensure that a personal information impact assessment is done to ensure that adequate measures and standards exist,
- Develop, monitor, maintain and make available a PAIA manual,
- Develop internal measures and adequate systems to process requests for access to information,
- Ensure that internal awareness sessions are conducted, and
- As may be prescribed (presumably by the Minister or the Information Regulator).

7. Records Available on request in Terms of the Act

7.1. Schedule of records held by REAM

For the purposes of this clause, “Personnel” refers to any person who works for, or provides services to, or on behalf of REAM and receives or is entitled to receive remuneration and any other person who assist in carrying out or conducting the business of REAM.

This includes, without limitation, directors (executive and non-executive), all permanent, temporary, and part-time staff, as well as contract workers.

This clause serves as a reference to the categories of information that REAM holds. The information is classified and grouped according to records relating to the following subjects and categories:

Subject	Category
REAM Records	a) Financial Records b) Operational records c) Databases d) IT e) Marketing records f) Internal correspondence g) Product records h) Statutory records i) Internal policies and procedures j) Securities and equities k) Tax and related records relevant to the Company and its employees l) Compliance related records and reports
Personnel Documents AndRecords	a) Any personal information provided to REAM by employees/personnel; b) Any records a third party has provided to REAM about its personnel; c) Conditions of employment and other personnel-related contractual and quasi-legal records; d) Internal evaluation records; e) Other internal records and correspondence related to the particular employee;

Client- related records	<p>a) Any records a client has provided to a third party acting for and on behalf of REAM;</p> <p>b) Any records a third part has provided to REAM regarding a client;</p> <p>c) Records generated by or within REAM pertaining to the client, including transactional records;</p>
Other Parties	<p>a) Personnel, client or REAM records which are held by another party;</p> <p>b) Records held by REAM pertaining to other parties, e.g. correspondence, contractual records and records provided about the contractors/suppliers;</p>

7.2. Note that the accessibility of the records may be subject to the grounds of refusal set out in this PAIA manual. Amongst other, records deemed confidential on the part of a third party, will necessitate permission from the third party concerned, in addition to normal requirements, before REAM will consider access.

8. Records Available without a Request to Access in terms of PAIA

8.1. Records of a public nature, typically those disclosed on the REAM website and in its various annual reports if applicable, may be accessed without the need to submit a formal application.

8.2. Other non-confidential records, such as statutory records maintained at CIPC, may also be accessed without the need to submit a formal application, however, please note that an appointment to view such records will still have to be made with the Information Officer.

9. Records Available in Accordance with any other Legislation

9.1. Where applicable to its operations, REAM may also retain records and documents in terms of the legislation below. Unless disclosure is prohibited in terms of legislation, regulations, contractual agreement or otherwise, records that are required to be made available in terms of these acts shall be made available for inspection by interested parties in terms of the requirements and conditions of PAIA. A request to access must be done in accordance with the prescriptions of PAIA.

- a. Basic Conditions of Employment Act, No 75 of 1997;
- b. Companies Act, No 71 of 2008;
- c. Compensation for Occupational Injuries & Diseases Act, 130 of 1993;
- d. Constitution of the Republic of South Africa 2008;

- e. Copyright Act, No 98 of 1978;
- f. Electronic Communications Act, No 36 of 2005;
- g. Electronic Communications and Transactions Act, No 25 of 2002;
- h. Employment Equity Act, No 55 of 1998;
- i. Financial Advisory and Intermediary Services Act, No 37 of 2002
- j. Financial Intelligence Centre Act, No 38 of 2001;
- k. Income Tax Act, No 58 of 1962;
- l. Intellectual Property Laws Amendment Act, No 38 of 1997;
- m. Labour Relations Act, No 66 of 1995;
- n. Short Term Insurance Act, No 53 of 1998 and subordinate legislation;
- o. Occupational Health & Safety Act, No 85 of 1993;
- p. Prescription Act, No 68 of 1969;
- q. Prevention of Organised Crime Act, No 121 of 1998;
- r. Promotion of Access to Information Act, No 2 of 2000;
- s. Protection of Personal Information Act, No. 4 of 2013;
- t. Regulation of Interception of Communications and Provision of Communication-Related Information Act 70 of 2002
- u. Unemployment Insurance Contributions Act 4 of 2002;
- v. Unemployment Insurance Act No. 30 of 1966;
- w. Value Added Tax Act 89 of 1991.

NOTE:

Although we have used our best endeavours to supply a list of applicable legislation, it is possible that this list may be incomplete. Whenever it comes to our attention that existing or new legislation allows a Requester access on a basis other than as set out in PAIA, we shall update the list accordingly. If a Requester believes that a right of access to a record exists in terms of other legislation listed above or any other legislation, the Requester is required to indicate what legislative right the request is based on, to allow the Information Officer the opportunity of considering the request in light thereof.

It is further recorded that the accessibility of documents and records may be subject to the grounds of refusal set out in this PAIA Manual.

10. Detail to Facilitate a Request for Access to a Record of REAM

- 10.1.** The requester must comply with all the procedural requirements contained in PAIA relating to the request for access to a record.

- 10.2.** The requester must complete the prescribed form enclosed herewith, and submit same as well as payment of a request fee and a deposit (if applicable) to the Information Officer or the Deputy Information Officer at the postal or physical address, fax number or electronic mail address as noted in clause 6 above.
- 10.3.** The prescribed form must be filled in with sufficient information to enable the Information Officer to identify:
- a. the record or records requested; and
 - b. the identity of the requester;
 - c. The form of access required;
 - d. Postal address and email address of the requester in RSA;
 - e. Details of the right which the requester is seeking to protect with sufficient explanation of the reason the record is required to exercise or protect the right. (section 53(2)(d)).
- 10.4.** REAM will process the request within 30 (thirty) days, unless the requester has stated special reasons to the satisfaction of the Information Officer that circumstances dictate that the above time periods not be complied with.
- 10.5.** The requester shall be advised whether access is granted or denied in writing. If, in addition, the requester requires the reasons for the decision in any other manner, the requester will be obliged to state which manner and the particulars required.
- 10.6.** If a request is made on behalf of another person, then the requester must submit proof of the capacity in which the requester is making the request to the reasonable satisfaction of the Information Officer (section 53(2)(f)).
- 10.7.** If an individual is unable to complete the prescribed form because of illiteracy or disability, such a person may make the request orally.
- 10.8.** The requester must pay the prescribed fee, before any further processing can take place.
- 10.9.** All information as listed in clause 12 herein should be provided and failing which the process will be delayed until the required information is provided. The prescribed time periods will not commence until the requester has furnished all the necessary and required information. The Information Officer shall sever a record, if possible, and grant only access to that portion requested and which is not prohibited from being disclosed.

11. Refusal of Access to Records

11.1. Grounds to Refuse Access

A private body such as REAM is entitled to refuse a request for information.

13.1.1. The main grounds for REAM to refuse a request for information relates to the:

- a. mandatory protection of the privacy of a third party who is a natural person or a deceased

- person (section 63) or a juristic person, as included in POPIA, which would involve the unreasonable disclosure of personal information of that natural or juristic person;
- b. mandatory protection of personal information and for disclosure of any personal information to, in addition to any other legislative, regulatory or contractual agreements, comply with the provisions of POPIA;
 - c. mandatory protection of the commercial information of a third party (section 64) if the record contains:
 - i. trade secrets of the third party;
 - ii. financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of that third party;
 - iii. information disclosed in confidence by a third party to REAM, if the disclosure could put that third party at a disadvantage in negotiations or commercial competition;
 - d. mandatory protection of confidential information of third parties (section 65) if it is protected in terms of any agreement;
 - e. mandatory protection of the safety of individuals and the protection of property (section 66);
 - f. mandatory protection of records which would be regarded as privileged in legal proceedings (section 67).

13.1.2 The commercial activities (section 68) of a private body, such as REAM, which may include:

- a. trade secrets of REAM;
- b. financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of REAM;
- c. information which, if disclosed could put REAM at a disadvantage in negotiations or commercial competition;
- d. Any information which is owned by REAM, and which is protected by copyright;
- e. the research information (section 69) of REAM or a third party, if its disclosure would disclose the identity of REAM, the researcher or the subject matter of the research and would place the research at a serious disadvantage.

13.1.3 Requests for information that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources shall be refused.

13.1.4 All requests for information will be assessed on their own merits and in accordance with the applicable legal principles and legislation.

13.1.5 If a requested record cannot be found or if the record does not exist, the Information Officer shall, in

writing, notify the requester that it is not possible to give access to the requested record. Such a notice will be regarded as a decision to refuse a request for access to the record concerned for the purpose of the Act. If the record should later be found, the requester shall be given access to the record in the manner stipulated by the requester in the prescribed form, unless the Information Officer refuses access to such record.

12. Remedies Available When REAM Refuses a Request

12.1. Internal Remedies

REAM does not have internal appeal procedures. The decision made by the Information Officer or the Deputy Information Officer is final. Requesters will have to exercise such external remedies at their disposal if the request for information is refused, and the requester is not satisfied with the answer supplied by the Information Officer.

12.2. External Remedies

- 12.2.1. A requestor that is dissatisfied with the Information Officer's refusal to disclose information, may within 30 (thirty) days of notification of the decision, may apply to a Court for relief.
- 12.2.2. A third party dissatisfied with the Information Officer's decision to grant a request for information, may within 30 (thirty) days of notification of the decision, apply to a Court for relief.
- 12.2.3. For purposes of PAIA, the Courts that have jurisdiction over these applications are the Constitutional Court, the High Court or another court of similar status and a Magistrate's Court designated by the Minister of Justice and Constitutional Development and which is presided over by a designated Magistrate.

13. Prerequisite for Access to Records Held by REAM

13.1. Prerequisites for Access by Personal/Other Requester

- 13.1.1. Records held by REAM may be accessed by requests only once the prerequisite requirements for access have been met.
- 13.1.2. A requester is any person making a request for access to a record of REAM. There are two types of requesters:
 - a. Personal Requester
 - i. A personal requester is a requester who is seeking access to a record containing personal information about the requester.
 - ii. REAM will voluntarily provide the requested information, or give access to any record with regard to the requesters personal information. The prescribed fee for reproduction

of the information requested may be charged.

b. Other Requester

- i. This requester (other than a personal requester) is entitled to request access to information on third parties.
- ii. In considering such a request, REAM will adhere to the provisions of PAIA and POPIA. Section 71 requires that the Information Officer take all reasonable steps to inform a third party to whom the requested record relates of the request, informing him/her that he/she may make a written or oral representation to the Information Officer why the request should be refused or, where required, give written consent for the disclosure of the Information.

REAM is not obliged to voluntarily grant access to such records. The requester must fulfill the prerequisite requirements, in accordance with the requirements of PAIA and as stipulated in Chapter 5; Part 3, including the payment of a request and access fee.

14. Prescribed Fees

14.1. Fees Provided by the Act and regulations

14.1.1. The Act provides for two types of fees, namely:

- a. A request fee, which is a form of administration fee to be paid by all requesters except personal requesters, before the request is considered and is not refundable; and
- b. An access fee, which is paid by all requesters in the event that a request for access is granted, except in those instances where payment of an access fee is specially excluded in terms of PAIA or an exclusion is determined by the Minister in terms of section 54(8). This fee is inclusive of costs involved by the private body in obtaining and preparing a record for delivery to the requester.

14.1.2. When the request is received by the Information Officer, such officer shall by notice require the requester, other than a personal requester, to pay the prescribed request fee, before further processing of the request (section 54(1)).

14.1.3. All fees are legislated and subject to change as allowed for in PAIA. Requesters shall be informed of the applicable fees at the time of making the request and prior to making a payment.

15. Decision

15.1. Time Allowed to Institution

15.1.1. REAM will, within 30 (thirty) days of receipt of the request, decide whether to grant or

decline the request and give notice with reasons (if required) to that effect.

- 15.1.2. The 30 (thirty) day period within which REAM has to decide whether to grant or refuse the request, may be extended for a further period of not more than (30) thirty days if the request is for a large number of information, or the request requires a search for information held at another office of REAM and the information cannot reasonably be obtained within the original 30 (thirty) day period.
- 15.1.3. REAM will notify the requester in writing should an extension be sought.

16. Protection of Personal Information that is Processed by REAM

- 16.1. POPIA and the Promotion of Access to Information Act (PAIA) hold a special relationship. Both can be seen as "information" laws, and are each on one end of a continuum. On the one end, PAIA is an "Access" law, all about Freedom of Information. POPIA on the other end, is about Privacy - prevention of exposure of information. They shouldn't be seen as competing, both rather, both are there to help ensure that information is managed correctly
- 16.2. Chapter 3 of the Protection of Personal Information Act, 4 of 2013 ("POPIA") provides for the minimum Conditions for Lawful Processing of Personal Information by a Responsible Party. These conditions may not be derogated from unless specific exclusions apply as outlined in POPIA.
- 16.3. REAM has a documented Data Protection Management Framework which sets out all legal requirements which we adhere to. A copy of this framework may be requested in writing from the Information Officer.
- 16.4. REAM needs Personal Information relating to both individual and juristic persons in order to carry out its business, organisational functions, in order to perform its appointed function to the service provider (Insurer) and to deliver services in accordance with insurance contracts entered into with clients and to fulfil our lawful obligations. The manner in which this information is Processed and the purpose for which it is Processed is determined by REAM and we are accordingly a Responsible Party for the purposes of POPIA and will ensure that the Personal Information of a Data Subject:
 - 16.4.1. is processed lawfully, fairly and transparently. This includes the provision of appropriate information to Data Subjects when their data is collected by REAM, in the form of a privacy statement. REAM must also have a legal basis (for example, requirement of law or consent) to process Personal Information;
 - 16.4.2. is processed only for the purposes for which it was collected;
 - 16.4.3. will not be processed for a secondary purpose unless that processing is compatible with the

original purpose.

- 16.4.4. is adequate, relevant and not excessive for the purposes for which it was collected;
- 16.4.5. is accurate and kept up to date;
- 16.4.6. will not be kept for longer than necessary;
- 16.4.7. is processed in accordance with integrity and confidentiality principles; this includes physical and organisational measures to ensure that Personal Information, in both physical and electronic form, are subject to an appropriate level of security when stored, used and communicated by REAM, in order to protect against access and acquisition by unauthorised persons and accidental loss, destruction or damage;
- 16.4.8. is processed in accordance with the rights of Data Subjects, where applicable. Data Subjects have the right to:
 - (a) be notified that their Personal Information is being collected by REAM. The Data Subject also has the right to be notified in the event of a data breach;
 - (b) know whether REAM holds Personal Information about them, and to access that information. Any request for information must be handled in accordance with the provisions of this Manual;
 - (c) request the correction or deletion of inaccurate, irrelevant, excessive, out of date, incomplete, misleading or unlawfully obtained personal information;
 - (d) object to REAM's use of their Personal Information and request the deletion of such Personal Information (deletion would be subject to REAM's legal record keeping obligations);
 - (e) object to the processing of Personal Information for purposes of direct marketing by means of unsolicited electronic communications; and
 - (f) complain to the Information Regulator regarding an alleged infringement of any of the rights protected under POPIA and to institute civil proceedings regarding the alleged non-compliance with the protection of his, her or its personal information.

18.4 Categories of Data Subjects and Personal Information/special Personal Information relating thereto

As per section 1 of POPIA, a Data Subject may either be a natural or a juristic person. Part 1 of Appendix 2 sets out the various categories of Data Subjects that REAM Processes Personal Information on and the types of Personal Information relating thereto.

18.5 Processing Activities and the associated Purpose of the Processing

Part 2 of Appendix 2 sets out purpose of the processing

18.6 Recipients of Personal Information

Part 3 of Appendix 2 outlines the recipients to whom REAM may provide a Data Subjects Personal

Information to.

18.7 Cross-border flows of Personal Information

Section 72 of POPIA provides that Personal Information may only be transferred out of the Republic of South Africa if the:

- a. recipient country can offer such data an “adequate level” of protection. This means that its data privacy laws must be substantially similar to the Conditions for Lawful Processing as contained in POPIA; or
- b. data Subject consents to the transfer of their Personal Information; or
- c. transfer is necessary for the performance of a contractual obligation between the Data Subject and the Responsible Party; or
- d. transfer is necessary for the performance of a contractual obligation between the Responsible Party and a third party, in the interests of the Data Subject; or
- e. the transfer is for the benefit of the Data Subject, and it is not reasonably practicable to obtain the consent of the Data Subject, and if it were, the Data Subject, would in all likelihood provide such consent.

Part 4 of Appendix 2 sets out the planned cross-border transfers of Personal Information and the condition from above that applies thereto.

18.8 Description of information security measures to be implemented by REAM

Part 5 of Appendix 2 sets out the types of security measures to be implemented by REAM in order to ensure that Personal Information is respected and protected. A preliminary assessment of the suitability of the information security measures implemented or to be implemented by REAM may be conducted in order to ensure that the Personal Information that is processed by REAM is safeguarded and Processed in accordance with the Conditions for Lawful Processing.

18.9 Objection to the Processing of Personal Information by a Data Subject

Section 11 (3) of POPIA and regulation 2 of the POPIA Regulations provides that a Data Subject may, at any time object to the Processing of his/her/its Personal Information in the prescribed form attached to this manual as Appendix 3 subject to exceptions contained in POPIA.

18.10 Request for correction or deletion of Personal Information

Section 24 of POPIA and regulation 3 of the POPIA Regulations provides that a Data Subject may request for their Personal Information to be corrected/deleted in the prescribed form attached as Appendix 4 to this Manual

17. Availability and Updating of the PAIA Manual

17.1. Regulation Number R.187 of 15 February 2002

17.1.1. This PAIA Manual is made available in terms of Regulation Number R.187 of 15 February 2002. REAM will update this PAIA Manual at such intervals as may be deemed necessary.

17.1.2. This PAIA Manual of REAM is available to view at its premises and on its website.

Appendix 1: Access Request Form



J752

REPUBLIC OF SOUTH AFRICA FORM C
REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY
(Section 53(1) of the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000))
[Regulation 10]

A. Particulars of private body The Head:

B. Particulars of person requesting access to the record

- (a) The particulars of the person who requests access to the record must be given below.

(b) The address and/or fax number in the Republic to which the information is to be sent must be given.

(c) Proof of the capacity in which the request is made, if applicable, must be attached.

Full names and surname:																						
Identity number:																						
Postal address:																						
Telephone number:	()	Fax number:	()
E-mail address:																						

Capacity in which request is made, when made on behalf of another person:

--

C. Particulars of person on whose behalf request is made

This section must be completed ONLY if a request for information is made on behalf of another person
--

Full names and surname:													
Identity number:													

D. Particulars of record

<p>(a) 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.</p> <p>(b) If the provided space is inadequate, please continue on a separate folio and attach it to this form. The requester must sign all the additional folios.</p>
--

1. Description of record or relevant part of the record:

--

2. Reference number, if available:

3. Any further particulars of record:

E. Fees

- (a) A request for access to a record, other than a record containing personal information about yourself, will be processed only after a request fee has been paid.
 - (b) You will be notified of the amount required to be paid as the request fee.
 - (c) 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.
 - (d) If you qualify for exemption of the payment of any fee, please state the reason for exemption.

Reason for exemption from payment of fees:

F. Form of access to record

If you are prevented by a disability to read, view or listen to the record in the form of access provided for in 1 to 4 below, state your disability and indicate in which form the record is required.

Disability:		Form in which record is required:	
Mark the appropriate box with an X.			
<p>NOTES:</p> <p>(a) Compliance with your request for access in the specified form may depend on the form in which the record is available.</p> <p>(b) Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form.</p> <p>(c) The fee payable for access to the record, if any, will be determined partly by the form in which access is requested.</p>			

1. If the record is in written or printed form:					
	copy of record*		inspection of record		
2. If record consists of visual images - (this includes photographs, slides, video recordings, computer-generated images, sketches, etc.):					
	view the images		copy of the images*		transcription of the images*
3. If record consists of recorded words or information which can be reproduced in sound:					
	listen to the soundtrack (audio cassette)		transcription of soundtrack* (written or printed document)		
4. If record is held on computer or in an electronic or machine-readable form:					
	printed copy of record*		printed copy of information derived from the record*		copy in computer readable form* (stiffy or

					compact disc)
--	--	--	--	--	---------------

*If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you? Postage is payable.	Yes	No
---	-----	----

G. Particulars of right to be exercised or protected

If the provided space is inadequate, please continue on a separate folio and attach it to this form. The requester must sign all the additional folios.

1. Indicate which right is to be exercised or protected:

2. Explain why the record requested is required for the exercise or protection of the aforementioned right:

H. Notice of decision regarding request for access

You will be notified in writing whether your request has been approved / denied. If you wish to be informed in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request.

How would you prefer to be informed of the decision regarding your request for access to the record?

Signed at this day of year.....

.....Signature of Requester /

Person on Whose Behalf Request is Made



REAM[®]

INSURANCE BROKERS (PTY) LTD EST 1989

REGISTRATION NUMBER: 2001/023867/07

AUTHORISED FINANCIAL SERVICES PROVIDER. LICENCE NUMBER 1422

Appendix 2: Part 1

Categories of Data Subjects and Categories of Personal Information relating thereto

Prospective, Current and Past Clients (which may include employees)

- a. title and name
- b. contact numbers and/or e-mail address
- c. postal and/or street address
- d. occupation
- e. age
- f. identity or passport number
- g. nationality
- h. financial information (banking details)
- i. browsing habits and click patterns on REAMs websites.

Prospective, Current and Past Employees

- a. Name and contact details
- b. Identity number and identity documents including passports
- c. Employment history and references
- d. Banking and financial details
- e. Qualifications
- f. Employment contracts
- g. Medical aid details
- h. Remuneration/salary records
- i. Performance appraisals
- j. Disciplinary records
- k. Leave records
- l. Training records

Director: R.V. du Plessis A.C.I.I A.I.I.S.A Chartered Insurance Practitioner (CEO)

Physical Address: Unit 2, 86 Regency Drive, Route 21 Corporate Park, Centurion, 0178

Postal Address: PO Box 11975, Aston Manor 1630

Email: info@tuffstuff.co.za

Tel : 0861 44 44 00 | **Fax :** 011 394 8917

Prospective, Current and Past Vendors /suppliers /other businesses:

- a. Name and contact details
- b. Identity and/or company information and directors' information
- c. Banking and financial information
- d. Information about products or services
- e. Other information not specified, reasonably required to be processed for business operations

Appendix 2: Part 2

Processing activities and Purpose of processing

Processing activities relating to Prospective, Current and Past Clients (which may include employees)

- a) Website enquiries from prospective clients requesting quotes;
- b) Quoting on a clients insurance needs and requests;
- c) Issuing of an insurance policy;
- d) Sharing of issued policy details with service suppliers and providers;
- e) Maintaining of the insurance policy;
- f) Cancellation of the insurance policy;
- g) Record keeping requirements which we have to adhere to in terms of legislation;
- h) Complaints management;
- i) Claims registration, management and finalization;
- j) Legal recoveries and approaches whereby we act on behalf of the client via subrogation of rights;
- k) Storage of Data for statistical and research purposes such as reporting to insurers, identifying of trends and establishing of reasonable rating structures to ensure fair outcomes for clients;

Purpose of processing relating to Prospective, Current and Past Clients (which may include employees)

- a) REAM processes Personal Information relating to both individual and juristic persons in order to carry out its business, organisational functions, in order to perform its appointed function to the service provider, to deliver services in accordance with insurance contracts entered into with clients and to fulfil our lawful obligations.

- b) We process personal information to provide clients with the services requested by them and as contracted in terms of their policy cover and benefits associated therewith, which includes:
 - Making contact with clients regarding their insurance arrangements
 - For the purposes of underwriting, fair assessment of risks and claims processing
 - To respond to clients inquiries and/or complaints
 - To confirm and verify clients identity or to verify that the person is an authorised person for security purposes
 - To process premium payments via debit order
 - For the detection and prevention of fraud, crime, money laundering or other malpractice
 - To conduct market or customer satisfaction research or for statistical analysis;
 - For audit and record keeping purposes;
 - In connection with legal proceedings.
- c) In addition, personal information may be retained for legal or research purposes

Processing activities and purpose of processing relating to Prospective, Current and Past Employees

- a) Recruitment of staff at which stage we will obtain copies of CV's and personal information in order to assess the candidates eligibility in terms of the legal requirements to enter the Financial Sector;
- b) Collection and processing of banking details for purposes of payroll to ensure appointed employee can be remunerated in accordance with the employment contract entered into;
- c) Collection and processing of compliance related documentation which may contain personal information and which purpose is to ensure we comply with all legal requirements relating to the financial industry;
- d) Record keeping of staff records as it relates to their employment with the Company and as may be required to assist them with future requests, such as UIF, possible reappointments, debarments etc;

Processing activities and purpose of processing relating to Prospective, Current and Past Vendors /suppliers /other businesses

- a) Procurement activities relating to prospective vendors/suppliers whereby we collect certain personal information to consider the appointment and utilization of services in accordance with mutually agreed contract terms;
- b) Storage of vendor/supplier personal information for purposes of future appointments or inhouse redflagging to ensure vendors or suppliers with substandard service delivery is not used;

- c) Payment of vendors/suppliers whereby banking details are collected in order to remunerate them for services rendered;

Appendix 2: Part 3

Recipients of Personal Information

- a) To give effect to the contract entered into, we must share certain personal information with third parties such as tracking companies; roadside assistance, product providers and all other service suppliers
- b) We may share personal information with other Insurance Companies or their agents
- c) We may share personal information with third parties located outside of the RSA to give effect to certain policy benefits, e.g., Repatriation or medical evacuation etc.
- d) We may also share personal information in circumstances where we have a duty or a right to disclose in terms of law or industry codes, or where we believe it is necessary to protect our rights
- e) We may share personal information with recruitment companies or prospective employers seeking references
- f) We may share personal information to facilitate remuneration within the company
- g) We may share personal information in relation to staff benefit programmes
- h) When we must share personal information with a third party, we impose appropriate security, privacy and confidentiality obligations on them to ensure your information is kept secure

Appendix 2: Part 4

Cross border transfers of Personal Information

Personal Information may be transmitted transborder to REAMs suppliers in other countries in circumstances where repatriations or medical evacuations are arranged in accordance with the contract entered into. Personal Information may be stored in data servers hosted outside South Africa. REAM will endeavor to impose appropriate security, privacy and confidentiality obligations on third party recipients to ensure your information is kept secure.

Appendix 2: Part 5

Description of data protection measures

REAM undertakes to institute and maintain the data protection measures to accomplish the

following objectives outlined below. REAM may use alternative measures and adapt to technological security development, as needed, provided that the objectives are achieved.

- a) Physical Security and Access Control
- b) Computer and network security
- c) Access to personal information
- d) Sharing of personal information
- e) Monitoring access and use of personal information
- f) Information Destruction Policy
- g) Reviewing of security control procedures
- h) Investigating and reacting to security incidents

Appendix 3: Objection to the Processing of Personal Information in terms of Section
11(3) of the Protection of Personal Information Act, 2013

Regulations Relating to The Protection of Personal Information, 2018

- 1) Affidavits or other documentary evidence as applicable in support of the objection may be attached.
- 2) If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.
- 3) Complete as is applicable.

A	DETAILS OF DATA SUBJECT
Name(s) and surname/ registered name of data subject:	
Unique Identifier/ Identity Number	
Residential, postal or business address:	
Contact number(s):	
Fax number / E-mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname/ registered name of data subject:	
Residential, postal or business address:	
Contact number(s):	
Fax number / E-mail address:	
C	REASONS FOR OBJECTION IN TERMS OF SECTION 11(1)(d) to (f) (Please provide detailed reasons for the objection)

Signed at this day of 20...

Signature of data subject/designated person

Appendix 4: Request for Correction or Deletion of Personal Information or Destroying or Deletion of Record of Personal Information in terms of Section 24(1) of the Protection of Personal Information Act, 2013

Regulations Relating to the Protection of Personal Information, 2018

[Regulation 3]

1. Affidavits or other documentary evidence as applicable in support of the request may be attached.
2. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.
3. Complete as is applicable.

Mark the appropriate box with an "x". Request for:

- a) Correction or deletion of the personal information about the data subject which is in possession or under the control of the responsible party.
- b) Destroying or deletion of a record of personal information about the data subject which is in possession or under the control of the responsible party and who is no longer authorised to retain the record of information

A	Details of Data Subject
Name(s) and surname/ registered name of data subject:	
Unique Identifier/ Identity Number	
Residential, postal or business address:	
Contact number(s):	
Fax number / E-mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname/ registered name of data subject:	
Residential, postal or business address:	
Contact number(s):	

Fax number / E-mail address:	
C	Reasons for Objection in Terms of Section 11(1)(D) to (F) (Please Provide Detailed Reasons for The Objection)
D	Reasons for *Correction or Deletion of the Personal Information about the Data Subject in Terms of Section 24(1)(a) which is in Possession or Under the Control of the Responsible Party; and or Reasons for *Destruction or Deletion of a Record of Personal Information about the Data Subject in Terms of Section 24(1)(b) which the Responsible Party is no longer Authorised to Retain. (Please Provide Detailed Reasons for the Request)

