



Clientèle

CLIENTÈLE LIMITED

(“The Clientèle Limited Group”)

(Registration number: 2007/023806/06)

PAIA MANUAL

**Prepared in terms of section 51 of the
Promotion of Access to Information Act 2
of 2000 “PAIA” (as amended)**

TABLE OF CONTENTS

| | | |
|----|---|----|
| 1. | INTRODUCTION | 3 |
| 2. | PURPOSE OF PAIA MANUAL | 4 |
| 3. | KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF THE CLIENTÈLE LIMITED GROUP | 5 |
| 4. | GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE | 5 |
| 5 | CATEGORIES OF RECORDS OF THE CLIENTÈLE LIMITED GROUP WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS | 7 |
| 6 | RECORDS THAT ARE AVAILABLE IN TERMS OF OTHER LEGISLATION | 8 |
| 7 | DESCRIPTION OF THE SUBJECTS ABOUT WHICH THE CLIENTÈLE LIMITED GROUP HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY THE CLIENTÈLE LIMITED GROUP | 10 |
| 8 | PROCESSING OF PERSONAL INFORMATION | 11 |
| 9 | AVAILABILITY OF THE MANUAL | 14 |
| 10 | PRESCRIBED FEES AND FORMS | 14 |
| 11 | GROUNDINGS FOR REFUSAL OF A REQUEST | 14 |
| 12 | UPDATING THE MANUAL | 16 |

1. INTRODUCTION

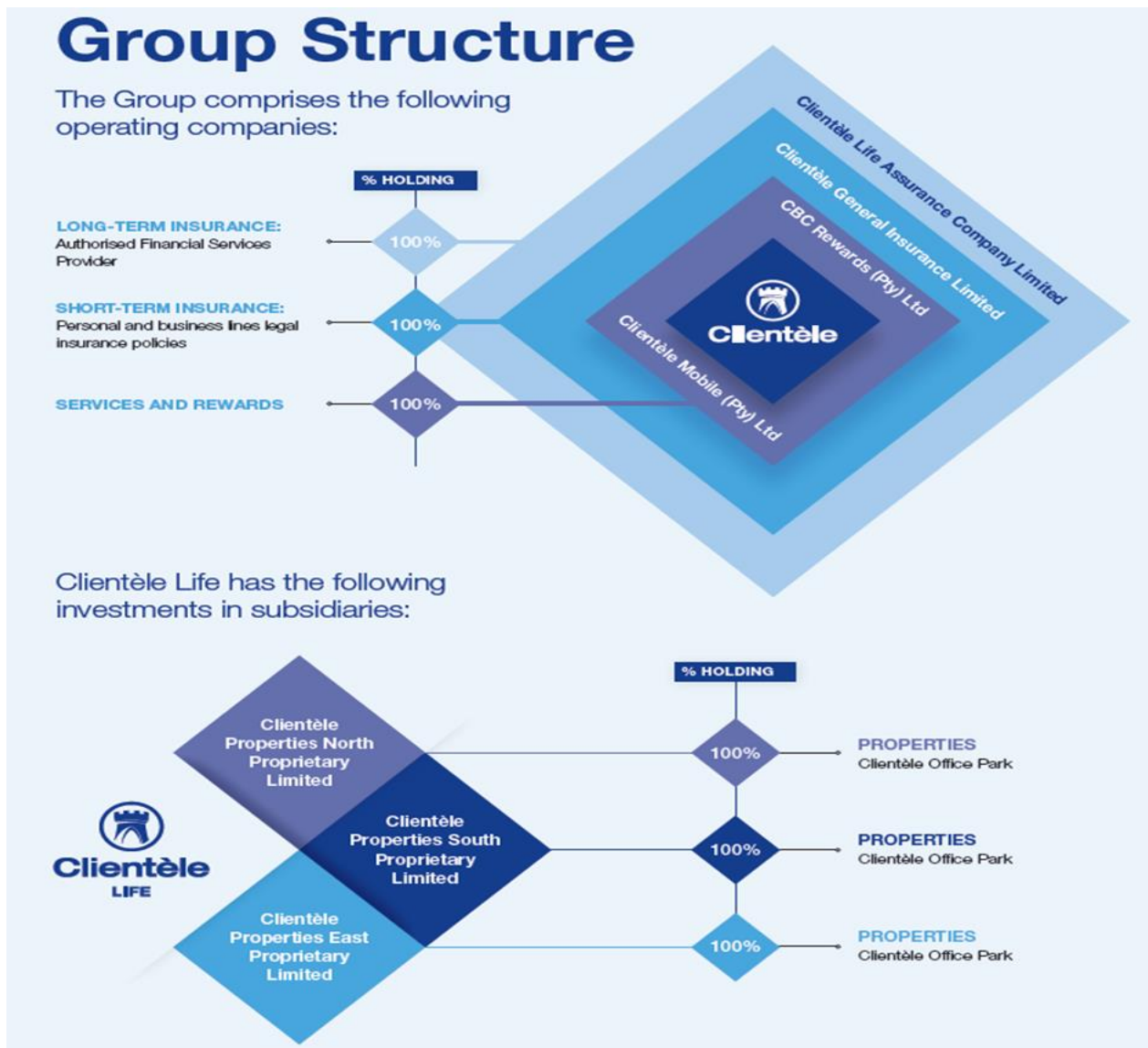
1.1 The manual has been prepared in terms of Promotion of Access to Information Act No 2 of 2000 (PAIA). PAIA gives effect to the to section 32 of the Constitution of the Republic of South Africa, which states that everyone has the right of access to:

1.1.1 Any information held by the government; and

1.1.2 Any information held by another person and that is required for the exercise or protection of any right.

1.2 PAIA places a duty on a private body to release information that has been requested and is permitted to be disclosed as per PAIA.

1.3 This manual is prepared for Clientèle Limited and the following entities of the Clientèle Limited Insurance Group: (“The Clientèle Limited Group”)



2. PURPOSE OF PAIA MANUAL

- 2.1 This manual sets out the process to be followed when requesting access to information held by the Clientèle Limited Group, in accordance with PAIA.
- 2.2 Lists the type of records held by the Clientèle Limited Group and the availability of such records.
- 2.3 Provides the contact details, prescribed access form and fees. The manual stipulates the decision making process as well as the grounds for refusal of a request and the process to be followed for a right of an appeal.
- 2.4 This PAIA Manual is useful for the public to-
 - 2.4.1 Check the categories of records held by the Clientèle Limited Group which are available without a person having to submit a formal PAIA request;
 - 2.4.2 Have sufficient understanding of how to make a request for access to a record of the Clientèle Limited Group by providing a description of the subjects on which the Clientèle Limited Group holds records and the categories of records held on each subject;
 - 2.4.3 Know the description of the records held by the Clientèle Limited Group which are available in accordance with any other legislation;
 - 2.4.4 Access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;
 - 2.4.5 Know the description of the guide on how to use PAIA as updated by the Information Regulator and how to obtain access to it;
 - 2.4.6 Know if the Clientèle Limited Group will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
 - 2.4.7 Know the description of the categories of data subjects and of the information or categories of information relating thereto;
 - 2.4.8 Know the recipients or categories of recipients to whom the personal information may be supplied;

2.4.9 Know if the Clientèle Limited Group has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and

2.4.10 Know whether the Clientèle Limited Group has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF THE CLIENTÈLE LIMITED GROUP

The Managing Director of Clientèle Limited Group, has delegated the responsibility for administration of and compliance with PAIA, to the Information Officer:

3.1 The Clientèle Limited Group Managing Director:

Name: Mr. Basil Reekie

Tel: +27(11) 320 3000

Email: breekie@Clientèle.co.za

3.2 Information Officer:

Name: Mr. Peter Robinson

Tel: +27(11) 320 3000

Email: PRObinson@Clientèle.co.za

3.3 Deputy Information Officer:

Name: Mrs. Phathutshedzo Makovhololo

Tel: 27(11) 320 3000

Email: PMakovhololo@Clientèle.co.za

3.4 Access to information general contact:

Name: Eben Smit (Clientèle Company Secretary)

Email: CompanySecretary@Clientèle.co.za

Telephone: +27(11) 320 3000

Website: www.Clientèle.co.za

3.5 The Clientèle Limited Group's Head Office

Physical Address:

Clientèle Office Park, corner Rivonia & Alon Roads, Morningside, 2196

Postal Address: PO Box 1316, Rivonia, 2128

Telephone: 011 320 3000

4. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

- 4.1 The Information Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the 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, 2013 (“POPIA”).
- 4.2 The Guide is available in each of the official languages and in braille.
- 4.3 The aforesaid Guide contains the description of-
 - 4.3.1 The object of PAIA and POPIA;
 - 4.3.2 The postal and street address, phone and electronic mail address of-
 - 4.3.2.1 the Information Officer of every public body, and
 - 4.3.2.2 every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA;
 - 4.3.3 The manner and form of a request for-
 - 4.3.3.1 access to a record of a public body contemplated in section 11; and
 - 4.3.3.2 access to a record of a private body contemplated in section 50;
 - 4.3.4 The assistance available from the Information Officer of a public body in terms of PAIA and POPIA;
 - 4.3.5 The assistance available from the Information Regulator in terms of PAIA and POPIA;
 - 4.3.6 All remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging –
 - 4.3.6.1 an internal appeal
 - 4.3.6.2 a complaint to the Information Regulator; and
 - 4.3.6.3 an application with a court against a decision by the Information Officer of a public body, a decision on internal appeal or a decision by the Information Regulator or a decision by the head of a private body;
 - 4.3.7 The provisions of sections 14 and 51 requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;

4.3.8 The provisions of section 15 and 52 providing for the voluntary disclosure of categories of records by a public body and private body, respectively;

4.3.9 The notices issued in terms of sections 22 and 54 regarding fees to be paid in relation to requests for access; and

4.3.10 The regulations made in terms of section 92.

4.4 Members of the public body can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Information Regulator during normal working hours.

4.5 The Guide can also be obtained from the website of the Information Regulator <https://inforegulator.org.za/paia-guidelines/>. Any queries related to the Guide must be directed to the Information Regulator's office.

4.6 A copy of the Guide is also available from the Clientèle Limited Group offices in two official languages for public inspection during normal office hours, as well as on the website.

- English and Afrikaans.

(<https://Clientèle.co.za/wp-content/uploads/2023/02/PAIA-Guide-English.pdf>)

(<https://Clientèle.co.za/wp-content/uploads/2023/02/PAIA-Guide-Afrikaans.pdf>)

5 CATEGORIES OF RECORDS OF THE CLIENTÈLE LIMITED GROUP WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

The following are categories of records held by the Clientèle Limited Group which are available without a person having to request access by completing **Form 2**, meaning the types of the records that may be available on the website and a person may download or request telephonically or by sending an email.

| Category of Records | Types of Record | Available on Website |
|---------------------|------------------------|----------------------|
| Website | • Product Information | X |
| | • Media Releases | X |
| | • Publications | X |
| | • Newsletters | X |
| | • Quotes | X |
| | • Product guides | X |
| | • Terms and Conditions | X |
| | • Privacy Policy | X |
| | • PAIA Manual | X |

6 RECORDS THAT ARE AVAILABLE IN TERMS OF OTHER LEGISLATION

Certain of the Clientèle Limited Group's records are available in terms of legislation other than PAIA. Records maintained by the Clientèle Limited Group in terms of other legislation includes but are not limited to:

| Subject | Legislation | Category of Record |
|----------------------|---|--|
| Human Resources | Labour Relations Act 66 of 1995 Basic Conditions of employment Act 75 of 1997 Pension Funds Act 24 of 1956 Compensation for Occupational Injuries and Diseases Act No 130 of 1993 Occupational Health and Safety Act No 85 of 1993 Employment Equity Act No 55 of 1998 Unemployment Insurance Act No 63 of 2001 Skills Development Act No 97 of 1998 Skills Development Levies Act No 9 of 1999 South African Qualifications Authority | <ul style="list-style-type: none"> • Employment contracts • Employment equity records • Health and safety records • Leave records • PAYE records and returns • Payroll information • Policies and procedures • Retirement benefits and medical aid records • Staff records • Training records • UIF returns • A health and safety committee shall keep record of each recommendation made to an employer in terms of issues affecting the health of employees and any report made to an inspector in terms of the Occupational Health and Safety Act section 20. |
| Corporate Governance | Companies Act 71 Of 2008 Broad Based Black Economic Empowerment Act No 53 of 2003 Stock Exchange Control Act No 1 of 1985 Trade Marks Act 194 of 1993 Consumer Protection Act No 68 of 2008 Electronic Communications Act No 36 of 2005 | <ul style="list-style-type: none"> • Memorandum of incorporation • Organisational structure board of directors • Companies registration documents; • Trademark copyrights and designs; • Insurance licenses and FSP licenses; • Disaster recovery procedures • accounts, books, writing, records or other information that a company is required to keep in terms of the Act and other public regulation. • Rules • Register of company secretary and auditors. • Record of directors and past directors after the director has retired from the company. • Notice and minutes of all shareholders meeting including: |

| | | |
|------------------------------------|--|---|
| | | <ul style="list-style-type: none"> • Resolutions adopted • Documents made available to holders of securities • Copies of annual financial statements required by the Act |
| Policyholder Information | <p>Financial Advisory and Intermediary Services Act No 37 of 2002</p> <p>Financial Intelligence Centre Act No 38 of 2001</p> <p>Insurance Act 18 of 2017</p> <p>Short-term Insurance Act No 53 of 1998</p> <p>Long-term Insurance Act 52 of 1998</p> <p>Prevention and Combating of Corrupt Activities Act No 12 of 2004</p> <p>Protection of Personal Information Act 4 of 2013</p> <p>Promotion of Access to Information Act 2 of 2000</p> | <ul style="list-style-type: none"> • Policyholder personal information • Product agreements • Claims information • Complaints information • Policy terms and conditions • Premature cancellations • Representatives register • Record of verbal and written communication • The amount involved and the currency in which it was denominated • Date of transaction • Parties to the transaction • Nature of transaction |
| Consumer Protection Act 68 of 2008 | Non-insurance products and clients | <ul style="list-style-type: none"> • Terms and conditions • Amounts, sums, values, charges, fees or remuneration specified in monetary terms • Frequency of accounting to the consumer • Cost to be recovered from the consumer • Service rendered • ID number and registration number • Full names, physical address, postal address and contact details • Promotional Competitions |
| Finance and Accounting | <p>Solvency Assessment and Management,</p> <p>IFRS</p> <p>Value Added Tax Act No 89 of 1991</p> <p>Income Tax Act No 58 of 1962</p> | <ul style="list-style-type: none"> • Accounting records • Asset registers • Audited financial statements • Audit Reports • Banking records • Computer software details • Correspondence • Disaster recovery procedures • Financial statements • Invoices • Management accounts • Procurement policies • Statutory Books of Account |

| | | |
|--|--|---|
| | | <ul style="list-style-type: none"> • Tax records • VAT records • Vouchers and invoices |
|--|--|---|

7 DESCRIPTION OF THE SUBJECTS ABOUT WHICH THE CLIENTÈLE LIMITED GROUP HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY THE CLIENTÈLE LIMITED GROUP

Below is a list of the subjects on which the Clientèle Limited Group holds records and the categories into which these fall. The process in terms of which such records may be requested from the Clientèle Limited Group is set out in **Annexure 1** of this Manual.

This information being listed in this Part 7 does not mean that the information will automatically be made available to the Requester in terms of Form 2 (<https://clientele.co.za/wp-content/uploads/2023/02/PAIA-Annexure-2-Form-2.pdf>). The Clientèle Limited Group may in terms of PAIA, refuse a request for information should any of the grounds of refusal set out in PAIA exist.

| Categories of records | Description of records held |
|------------------------------|--|
| Finance and administration | <ul style="list-style-type: none"> • Accounting records • Asset registers • Audited financial statements • Audit Reports • Banking records • Computer software details • Correspondence • Disaster recovery procedures • Financial statements • Invoices • Management accounts • Procurement policies • Statutory Books of Account • Tax records • VAT records • Vouchers and invoices |
| Human Resources and Training | <ul style="list-style-type: none"> • Disciplinary reports • Employment contracts • Employment Equity records • Health and safety records • Leave records • PAYE records and returns • Payroll information • Policies and procedures • Retirement benefits and Medical aid records |

| | |
|---|--|
| | <ul style="list-style-type: none"> • Staff records • Training records • UIF returns • Personal information |
| Operations | <ul style="list-style-type: none"> • Policy documents • Master contracts • Investment mandate • Billings processes • Sales scripts • Recorded sales calls • Breach registers |
| Sales and Marketing | <ul style="list-style-type: none"> • Advertising campaign details • Market materials • Marketing strategy |
| Clients/policyholders (including potential clients) | <ul style="list-style-type: none"> • Personal information • Product agreements • Location information |
| Suppliers and contractors | <ul style="list-style-type: none"> • Personal information • Contracts |
| Visitors | <ul style="list-style-type: none"> • Personal information • Access & surveillance records |
| General | <ul style="list-style-type: none"> • Company secretarial records • Contracts and agreements • Insurance records • Property records • Service level agreements • Statutory records • Trademark records • Vehicle registration documents |

8 PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

The Clientèle Limited Group will only process personal information in accordance with its privacy policy which is available on the Clientèle Limited Group's website: <https://Clientèle.co.za/wp-content/uploads/2020/09/Privacy-policy-2020.pdf>.

8.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto.

This section specifies the categories of data subjects in respect of whom the Clientèle Limited Group processes personal information and the nature or categories of the personal information being processed. The inclusion of any subjects of records should not be taken as an indication that the records in those categories will be made available under PAIA, as certain grounds for refusal may be applied.

| Categories of Data Subjects | Personal Information that may be Processed |
|-----------------------------|---|
| Clients | <ul style="list-style-type: none"> • Name and surname • Identity number • Address • Gender • Race • Health • Contact Information • Banking Details • Employment status • Company Registration number |
| Service Providers | <ul style="list-style-type: none"> • Name of the business • FSP number • Company Registration Numbers, Vat numbers • Address • Bank Details • Qualifications • Financial statements |
| Employees | <ul style="list-style-type: none"> • Names and surnames • Identity number • Address • Gender • Race • Contact information • Banking details • Company registration number • Sick leave records • Qualifications • Credit records and payment history • Criminal records |
| Suppliers and contractors | <ul style="list-style-type: none"> • Name of the business • Company Registration Numbers • Vat number • Address • Banking Details • Financial information, authorised contracts |

| | |
|-----------------|---|
| Visitors/guests | <ul style="list-style-type: none"> • Personal information • Access & surveillance records |
|-----------------|---|

8.3 The recipients or categories of recipients to whom the personal information may be supplied:

| Category of information | Recipients or categories of recipients to whom the personal information may be supplied |
|---|--|
| Identity number and names for criminal checks | South African Police Service (SAPS) |
| Qualifications verification | South African Qualifications Authority (SAQA), Regulatory bodies |
| Credit and payment history for credit information | Credit Bureaus |
| Name, address, registration numbers or identity numbers and banking details | Third party contractors |
| Name, address, registration numbers or identity numbers and bank details, business information, statutory reports, and business returns | Regulatory and industry bodies (ASISA; Long Term Insurance Ombudsman; Ombudsman for Short Term Insurance (OSTI); Financial Sector Conduct Authority (FSCA); Prudential Authority (PA); and Financial Intelligence Centre (FIC) |

8.4 Planned trans-border flows of personal information

The Clientèle Limited Group uses Storage Area Network (SAN) technology for hosting data in its database systems. The data is stored locally (onsite). The Clientèle Limited Group has the necessary security functionality to its systems which safeguard personal information against malicious access and use. These measures are over and above the standard data protection policies that is implemented across the Microsoft platform.

In addition to this, the Clientèle Limited Group uses a Mobile Application infrastructure which is cloud-based, and which is hosted in Ireland. The necessary security protocols, agreements and systems are in place.

8.5 General description of Information Security Measures implemented by the Clientèle Limited Group to ensure the confidentiality, integrity and availability of the information

The Clientèle Limited Group has its information systems built on the SQL and D3 (PIC) database systems. Data protection for confidentiality, integrity and availability is implemented in numerous protection forms, including replication, backup, and a segmented network with a firewall. The acceptable use of all the Clientèle Limited Group devices and information systems are governed by the standard and its related policies.

The Clientèle Limited Group uses the Centre for Internet Security (CIS) framework as a guideline for its security standards and policies which allows for safeguarding information, including personal

information. It ensures that basic security platforms, solutions, software, principles and architecture is in-place to protect its information systems against data leakage and the misuse of information.

9 AVAILABILITY OF THE MANUAL

9.1 The manual is available –

9.1.1 for inspection at the Morningside offices of the Clientèle Limited Group free of charge;

9.1.2 on the Clientèle Limited Group's website: <https://clientele.co.za/paia-manuals/>

9.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and

9.1.4 to the Information Regulator upon request.

9.2 A fee for a copy of the Manual, as contemplated in annexure B of the Regulations shall be payable per each A4- size photocopy.

10 PRESCRIBED FEES AND FORMS

10.1 Any other request under PAIA must be made on the required forms and upon payment of prescribed fees (please see **Annexure's 1 - 3** in this regard).

<https://Clientèle.co.za/wp-content/uploads/2023/02/PAIA-Annexure-2-Form-2.pdf>

<https://Clientèle.co.za/wp-content/uploads/2023/02/PAIA-Annexure-3-Form-3.pdf>

10.2 The prescribed forms and fees for requests to private bodies are also available on the websites of the Information Regulator: <https://inforegulator.org.za/paia-forms/>.

11 GROUNDS FOR REFUSAL OF A REQUEST

11.1 PAIA recognises that the right to any information may be limited to the extent that such limitations are reasonable and justifiable in an open and democratic society based on human dignity, equality and freedom as contemplated in Section 36 of the Constitution; and therefore, the Clientèle Limited Group may refuse to grant a requester access to records in certain circumstances.

11.2 Subject to Section 70 of PAIA, the Clientèle Limited Group may refuse a request for access to records as contemplated by PAIA if the information contained in the record relates to:

- 11.2.1 Protection of privacy of a third party, including a deceased individual, if that third party is a natural person, which would involve the unreasonable disclosure of personal information of that natural person (Section 63(1) of PAIA);
- 11.2.2 Protection of commercial information of a third party as defined in PAIA if the record contains:
 - 11.2.2.1 trade secrets of that third party;
 - 11.2.2.2 financial, commercial scientific or technical information other than trade secrets of a third party, the disclosure of which would be likely to cause harm to the commercial or financial interests of that third party; and
 - 11.2.2.3 information disclosed in confidence to the Clientèle Limited Group by a third party, the disclosure of which could put that third party at a disadvantage in contractual or other negotiations or would prejudice that third party in commercial competition (Section 64 of PAIA).
- 11.2.3 Protection of confidential information if the disclosures would constitute a breach of duty or confidence to a third party in terms of an agreement (section 65 PAIA);
- 11.2.4 Protection of safety of individuals and protection of property (Section 66 of PAIA);
- 11.2.5 Protection of records which would be regarded as privileged in legal proceedings or subject to legal privilege in any other respect, unless the person so entitled to privilege waives the privilege (Section 67 of PAIA)
- 11.2.6 Protection of commercial activities of the Clientèle Limited Group, which includes:
 - 11.2.6.1 trade secrets of the Clientèle Limited Group;
 - 11.2.6.2 financial, commercial scientific or technical information, disclosure of which could cause harm to the financial or commercial interests of the Clientèle Limited Group;
 - 11.2.6.3 information, which if disclosed, could put the Clientèle Limited Group at a disadvantage in negotiations or commercial competition; and
 - 11.2.6.4 a computer programme owned by the Clientèle Limited Group, and which is protected by copyright (Section 68 of PAIA).
- 11.2.7 The research information of the Clientèle Limited Group or a third party on behalf of the Clientèle Limited Group if the disclosure would expose the third party, the Clientèle Limited Group, the researcher or the subject matter of the research to serious disadvantage (Section 69 of PAIA).

12 UPDATING THE MANUAL

This Manual may be amended and updated from time to time, provided that if the Clientèle Limited Group does so, it will ensure that such changes are carried out subject to and published in accordance with PAIA and POPIA.

ANNEXURE 1 - PAIA PROCESS

1. The requester must use the prescribed form (**see Prescribed Form 2 – see attached Annexure 2**) <https://Clientèle.co.za/wp-content/uploads/2023/02/PAIA-Annexure-2-Form-2.pdf> to make the request for access to a record. This must be made to the Information Officer. This request must be made to the address or electronic mail address of the Information Officer.
2. The requester must provide sufficient detail on the request form to enable the Information Officer to identify the record and the requester. The requester should also indicate which form of access is required. The requester should also indicate if he or she wishes to be informed in any other manner and state the necessary particulars to be so informed.
3. The requester must identify the right that he or she is seeking to exercise or protect and provide an explanation as to why the requested record is required for the exercise or protection of that right.
4. If a request is made on behalf of a person, the requester must submit proof of the capacity in which the requester is making the request to the satisfaction of the Information Officer.
5. The Clientèle Limited Group will review the application and all documents and notify the requester of the applicable fees. (**see Form 3 – Annexure 3**) <https://Clientèle.co.za/wp-content/uploads/2023/02/PAIA-Annexure-3-Form-3.pdf>. A personal requester does not pay such fee.
6. The requester may lodge an application to court against the tender or payment of the request fee.
7. Upon receipt of payment and applicable forms the Clientèle Limited Group will make a decision on the request and notify the requester in the required form, within 30 days of a decision to grant or deny a request.
8. If the request is granted, the Clientèle Limited Group will calculate a further access and reproduction fee which is payable prior to providing the information requested, for any time that had exceeded the prescribed hours to search and prepare the record for disclosure .
9. Once the requester accepts all costs, the Clientèle Limited Group will proceed with the preparation and arranging information.
10. The Clientèle Limited Group will notify the requested of estimated timelines and expected delivery date.
11. The requester will receive the information in the format requested in the application form.