



ASSURITY
INSURANCE BROKERS

FSP No. 48680

ASSURITY INSURANCE BROKERS

PAIA MANUAL

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

**DATE OF COMPILATION: October 2021
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Registration Number: 2014/276799/07 • **Directors:** SJPK Van Deventer & SLF Florentino

1. LIST OF ACRONYMS AND ABBREVIATIONS

- | | | |
|-----|--------------------|--|
| 1.1 | “CEO” | Chief Executive Officer |
| 1.2 | “DIO” | Deputy Information Officer; |
| 1.3 | “IO“ | Information Officer; |
| 1.4 | “Minister” | Minister of Justice and Correctional Services; |
| 1.5 | “PAIA” | Promotion of Access to Information Act No. 2 of 2000(as Amended); |
| 1.6 | “POPIA” | Protection of Personal Information Act No.4 of 2013; |
| 1.7 | “Regulator” | Information Regulator; and |
| 1.8 | “Republic” | Republic of South Africa |

2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

- 2.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 2.2 have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- 2.3 know the description of the records of the body which are available in accordance with any other legislation;
- 2.4 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;

- 2.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 2.6 know if the body 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;
- 2.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 2.9 know if the body 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
- 2.10 know whether the body 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 ASSURITY INSURANCE BROKERS (PTY) LTD

3.1. Chief Information Officer

Name: Leo Van Wyk
Tel: 021 556 8396
Email: leo@bminvestments.co.za

3.3 Access to information general contacts

Email: data.protection@assurity.co.za

3.4 National or Head Office

Postal Address: 1st Floor, Block J, Sable Square, Milnerton, Cape Town,
South Africa, 7441

Physical Address: 1st Floor, Block J, Sable Square, Milnerton, Cape Town,
South Africa, 7441

Telephone: 021 556 8396

Email: info@assurity.co.za

Website: www.assurity.co.za

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

4.1. The 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 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 objects of PAIA and POPIA;

4.3.2. the postal and street address, phone and fax number and, if available, 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 PAIA¹ and section 56 of POPIA²;

¹ Section 17(1) of PAIA- *For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.*

² Section 56(a) of POPIA- *Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) 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 11³; and
 - 4.3.3.2. access to a record of a private body contemplated in section 50⁴;
- 4.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;
- 4.3.5. the assistance available from the 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 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 Regulator or a decision of the head of a private body;
- 4.3.7. the provisions of sections 14⁵ and 51⁶ requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;

³ Section 11(1) of PAIA- A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

⁴ Section 50(1) of PAIA- A requester must be given access to any record of a private body if-

- a) that record is required for the exercise or protection of any rights;
- b) that person complies with the procedural requirements in PAIA relating to a request for access to that record; and
- c) access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

⁵ Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

⁶ Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.

- 4.3.8. the provisions of sections 15⁷ and 52⁸ 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 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
- 4.3.10. the regulations made in terms of section 92¹¹.
- 4.4. Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.
- 4.5. The Guide can also be obtained-
 - 4.5.1. upon request to the Information Officer;
 - 4.5.2. from the website of the Regulator (<https://www.justice.gov.za/infoereg/>).
- 4.6 A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours-
 - 4.6.1 English and Afrikaans

5. CATEGORIES OF RECORDS OF ASSURITY INSURANCE BROKERS (PTY) LTD WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS.

⁷ Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access

⁸ Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access

⁹ Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹⁰ Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹¹ Section 92(1) of PAIA provides that –“The Minister may, by notice in the Gazette, make regulations regarding-
 (a) any matter which is required or permitted by this Act to be prescribed;
 (b) any matter relating to the fees contemplated in sections 22 and 54;
 (c) any notice required by this Act;
 (d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and
 (e) any administrative or procedural matter necessary to give effect to the provisions of this Act.”

Category of records	Types of Records	Available on Website	Available upon request
Communications/Public Affairs	Current Product Information	X	X
	Launches and Events Records		X
Records	Statutory Records		X
	Training Records		X
	Insurance Information		X
Human Resources	Attendance Registers		X
	Employee Records		X
	Employment Contracts		X
	Employee Medical Records		X
	Minutes of Staff Meetings		X
	Employment Equity Records		X
	Performance Appraisals		X
	Information relating to Employee Sales Performance		X
	Personnel Guidelines, Policies and Procedures		X
	Remuneration Records and Policies		X
	Salary Surveys		X
	Information relating to Health and Safety Regulations		X
Compliance	Company Guidelines, Policies and Procedures		X
	IT Policies and Procedures		X
	Staff Recruitment Policies		X
Finance	Audited Financial Statements		X
	Supplier Records		X
	Asset Register		X
Health & Safety	Information relating to Health and Safety Regulations		X

Management	Minutes of Management Meetings		X
	General Correspondence		X
Marketing	Brochures on Company Information		X
	Marketing Records		X
IT	Network Diagrams		X
Risk Control Centre	Complaints and Investigations Records		X

6. DESCRIPTION OF THE RECORDS OF ASSURITY INSURANCE BROKERS WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Category of Records	Applicable Legislation
Memorandum of Incorporation	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000
POPIA Manual	Protection of Personal Information Act (No. 4 of 2013)

7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY ASSURITY INSURANCE BROKERS (PTY) LTD

NB: Describe the subjects (i.e. Finance, SCM or HR), in respect of which the body holds records and the categories of records held on each subject. Below is an example of the table that can be used. .

Subjects on which the body holds records	Categories of records
Strategic Documents, Plans, Proposals	Annual Reports, Strategic Plan, Annual Performance Plan.
Human Resources	<ul style="list-style-type: none"> - HR policies and procedures - Advertised posts - Employees records

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

8.1.1 If it is necessary to conclude or perform under a contract that Assurity Insurance Brokers (Pty) Ltd has with a customer or to provide a solution to a customer. This includes: assess and process applications for solutions; to conduct affordability assessments, credit assessments and credit scoring; to provide a customer with solutions they have requested; to enable Assurity Insurance Brokers (Pty) Ltd to deliver goods, documents or notices to customers; to communicate with customers and carry out customer instructions and requests; to respond to customer enquiries and complaints; to enforce and collect on any agreement when a customer is in default or breach of the terms and conditions of the agreement, such as tracing a customer, or to institute legal proceedings against a customer; to disclose and obtain personal information from credit bureaus regarding a customer's credit history; to meet record-keeping obligations; to conduct market and behavioural research, including scoring and analysis to determine if a customer qualifies for solutions, or to determine a customer's credit or insurance risk; to enable customers to participate in and make use of value-added solutions; for customer satisfaction surveys, promotional and other competitions; for security and identity verification, and to check the accuracy of customer personal information; or for any other related purposes.

8.1.2 Assurity Insurance Brokers (Pty) Ltd may process customers' personal information if the law requires or permits it. This includes: to comply with legislative, regulatory, risk and compliance requirements (including directives, sanctions and rules); to comply with voluntary and involuntary codes of conduct and industry agreements; to fulfill reporting requirements and information requests; to process payment instruments and payment instructions (such as a debit order); to meet record-keeping obligations; to detect, prevent and report theft, fraud, money laundering, corruption and other crimes. This may include the

processing of special personal information, such as alleged criminal behaviour or the supply of false, misleading or dishonest information when concluding a transaction with Assurity Insurance Brokers (Pty) Ltd, or avoiding liability by way of deception, to the extent allowable under applicable privacy laws. This may also include the monitoring of our buildings including CCTV cameras and access control.

8.1.3 Assurity Insurance Brokers (Pty) Ltd may process customers' personal information in the daily management of its business and finances and to protect the its's customers, employees, service providers and assets. It is to Assurity Insurance Brokers (Pty) Ltd's benefit to ensure that its procedures, policies and systems operate efficiently and effectively. Assurity Insurance Brokers (Pty) Ltd may process customers' personal information to provide them with the most appropriate solutions and to develop and improve solutions and Assurity Insurance Brokers (Pty) Ltd's business. Assurity Insurance Brokers (Pty) Ltd may process a customer's personal information if it is required to protect or pursue their, Assurity Insurance Brokers (Pty) Ltd's or a third party's legitimate interest.

8.1.4 If a customer is a juristic person, such as a company or close corporation, Assurity Insurance Brokers (Pty) Ltd may collect and use personal information relating to the juristic person's directors, officers, employees, beneficial owners, partners, shareholders, members, authorised signatories, representatives, agents, payers, payees, customers, guarantors, spouses of guarantors, sureties, spouses of sureties, other security providers and other persons related to the juristic person. These are related persons. If customers provide the personal information of a related person to Assurity Insurance Brokers (Pty) Ltd, they warrant that the related person is aware that they are sharing their personal information with Assurity Insurance Brokers (Pty) Ltd, and that the related person has consented thereto.

8.1.5 Assurity Insurance Brokers (Pty) Ltd will process the personal information of related persons as stated in this notice, thus references to "customer/s" in this notice will include related persons with the necessary amendments.

8.1.6 PROCESSING CUSTOMERS' SPECIAL PERSONAL INFORMATION

Assurity Insurance Brokers (Pty) Ltd may process customers' special personal information in the following circumstances, among others: if the processing is needed to create, use or protect a right or obligation in law; if the processing is for statistical or research purposes, and all legal conditions are met; if the special personal information was made public by the customer; if the processing is required by law; if racial information is processed and the processing is required to identify the customer; if health information is processed, and the processing is to determine a customer's insurance risk, or to comply with an insurance policy, or to enforce an insurance right or obligation; or if the customer has consented to the said processing.

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

Categories of Data Subjects	Personal Information that may be processed
Customers / Clients	Name, Address, Registration Numbers or Identity Numbers, Employment Status and Bank Details
Service Providers	Names, Registration Number, Vat Numbers, Address, Trade Secrets and Bank Details
Business Partners	Name, Address, Registration Numbers or Identity Numbers
Employees	Personal Information, Address, Qualifications, Gender, Race, Medical Information, Disability Information, Pension and Provident Fund, Contacts, Performance Records, Employment History, Time and Attendance Reports

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

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Identity number and names, for criminal checks	South African Police Services
Qualifications, for qualification verifications	South African Qualifications Authority
Credit and payment history, for credit information	Credit Bureaus

8.4 Planned transborder flows of personal information

Assurity Insurance Brokers will not transfer personal information across South African borders unless the relevant business dealings requires trans-border processing. If information is transferred cross-border it will be in accordance with South African legislative requirements; or if the data subject consents to transfer of their personal information to third parties in foreign countries.

8.5 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information

All policies and procedures regarding the confidentiality, integrity and availability of information are outlined in our relevant Frameworks and Manuals and further information can be requested if required or an email can be sent to compliance@assurity.co.za

9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

9.1.1 on www.assurity.co.za

9.1.2 head office of Assurity Insurance Brokers (Pty) Ltd for public inspection during normal business hours;

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 made.

10. UPDATING OF THE MANUAL

The head of Assurity Insurance Brokers will on a regular basis update this manual.

Issued by



Leo Van Wyk

Chief Information Officer