

INFORMATION MANUAL
As prescribed by the provisions of
THE PROMOTION OF ACCESS TO INFORMATION ACT, 2000

And
THE PROTECTION OF PERSONAL INFORMATION ACT, 2013

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INTRODUCTION

Paradigm Risk Consultants (PTY) LTD is an Underwriting Management Agent and authorised Financial Services Provider, FSP Number 4518. We hold binder agreements with and acting on behalf of, Centriq Insurance Company Limited and Compass Insurance Company Limited.

For the purposes of PAIA, details the procedure to be followed by a Requester and the manner in which a Request for Access will be facilitated

For the purposes of POPIA, details the purpose for which Personal Information may be processed; the categories of Personal Information relating to such Data Subjects and the recipients to whom Personal Information may be supplied.

DEFINITIONS

Company means Paradigm Risk Consultants (PTY) Limited, registration number 1997/022015/07, a company duly registered and incorporated with limited liability in accordance with the company laws of the Republic of South Africa and having its registered place of business situated at 73 5th Avenue, Edenvale, Gauteng, Republic of South Africa;

Conditions for Lawful Processing means the conditions for the lawful processing of Personal Information as fully set out in chapter 3 of POPIA;

Constitution means the Constitution of the Republic of South Africa, 1996;

Customer refers to any natural or juristic person that received or receives services from the Company;

Data Subject has the meaning ascribed thereto in section 1 of POPIA;

Head of the Company means the “head” as defined in section 1 of PAIA and referred to under the Contact Details in clause 4;

Information Officer means the Company’s appointed Information Officer as referred to under the Contact Details in clause 4;

Manual means this manual prepared in accordance with section 51 of PAIA and regulation 4(1) (d) of the POPIA Regulations;

PAIA means the *Promotion of Access to Information Act, 2000*;

Personal Information has the meaning ascribed thereto in section 1 of POPIA;

Personnel refers to any person who works for, or provides services to or on behalf of the Company, and receives or is entitled to receive remuneration and any other person who assists in carrying out or conducting the

business of the Company, which includes, without limitation, directors (executive and non-executive), all permanent, temporary and part-time staff as well as contract workers;

POPIA means the *Protection of Personal Information Act, 2013*;

POPIA Regulations mean the regulations promulgated in terms of section 112(2) of POPIA;

Private Body has the meaning ascribed thereto in sections 1 of both PAIA and POPIA;

Processing has the meaning ascribed thereto in section 1 of POPIA;

Responsible Party has the meaning ascribed thereto in section 1 of POPIA;

Record has the meaning ascribed thereto in section 1 of PAIA and includes Personal Information;

Requester has the meaning ascribed thereto in section 1 of PAIA;

Request for Access has the meaning ascribed thereto in section 1 of PAIA;

SAHRC means the South African Human Rights Commission.

Capitalised terms used in this Manual have the meanings ascribed thereto in Section 1 of POPIA and PAIA as the context specifically requires, unless otherwise defined herein.

WHO MAY REQUEST ACCESS TO INFORMATION

A Requester is only entitled to access to a record for the exercise or protection of a right.

If the Requester has satisfied the Information Officer that the record is required to exercise or protect a right, it will be considered.

Requesters may make a request as:

- a personal Requester who requests a record about him/herself;
- an agent Requester who requests a record on behalf of someone else with that person's consent and where it is required for the protection of that person's legal right;
- a third party Requester who requests a record about someone else with that person's consent and where it is required for the protection of that person's legal right; and
- A public body who may request a record if:
 - it fulfils the requirements of procedural compliance;
 - the record is required for the exercise or protection of a right; and
 - no grounds for refusal exist.

Requesters are referred to the Guide in terms of Section 10 of PAIA, as compiled by the South African Human Rights Commission, which contains information for the purposes of exercising rights in terms of the Constitution. The Guide is available from the SAHRC. The contact details of the Commission: *Postal Address: Private Bag 2700, Houghton, 2041. Telephone Number: +27-11-877 3600. Fax Number: +27-11-403 0625. Website:*

www.sahrc.org.za

POLICY WITH REGARD TO CONFIDENTIALITY AND ACCESS TO INFORMATION

Subject to any applicable law, Paradigm Risk Consultants (PTY) LTD will protect the confidentiality of information provided to it by third parties.

If access is requested to a record that contains information about a third party, the Company is obliged to attempt to contact this third party to inform them of the request. This allows them to consent or deny, which will be considered by the Information Officer.

GROUNDINGS FOR REFUSAL TO GRANT ACCESS TO RECORDS

Requests for the Company Activities i.e., trade secrets; financial scientific or technical information which could cause harm to the interests of the Company

Requests for Information that would be privileged in Legal proceedings

Request for Information that may cause harm to individuals or property

Request for any information that is protected by any agreement

Request for Information of a Commercial Third Party that may contain trade secrets; financial scientific or technical information which could cause harm to the interests of the Third Party

Requests for Information of a natural person that may be deemed unreasonable disclosure of information of that natural person.

THE REQUEST PROCEDURE

Complete the **Request for Access** to make the request for access to a record. This request must be made to the physical address or email address noted under the heading of this manual.

The Information Officer requires comprehensive information to identify the record requested. The Requester should also indicate which form of access is required

The Requester must identify the right that is sought to be exercised or to be protected and provide an explanation of why the requested record is required for the exercise or protection of that right.

If a Request is made on behalf of another person, the requester must then submit proof of the capacity in which the requester is making the request to the satisfaction of the Information Officer.

The requisite fees payable are set out in the **Prescribed Fee Schedule** hereto.

PROCESSING OF PERSONAL INFORMATION

The Company is accordingly a Responsible Party for the purposes of POPIA and will ensure that the Personal Information of a Data Subject:

- a) is processed lawfully, fairly and transparently.
- b) is processed only for the purposes for which it was collected;

- c) will not be processed for a secondary purpose unless that processing is compatible with the original purpose.
- d) is adequate, relevant and not excessive for the purposes for which it was collected;
- e) is accurate and kept up to date;
- f) will not be kept for longer than necessary;
- g) 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 the Company, in order to protect against access and acquisition by unauthorised persons and accidental loss, destruction or damage;
- h) 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 the Company. The Data Subject also has the right to be notified in the event of a data breach;
- b) know whether the Company 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 Personal Information by completing and submitting the prescribed **FORM 1** or **FORM 2** as the case may be;

The Company may transfer data trans-border in order to store data with third party cloud storage providers.

CATEGORIES OF RECORDS HELD BY THE COMPANY

Operational Information

The Company business activities including (but not limited to) contracts; claim records; premium records; policy documents; reinsurance treaties; binder agreements; facultative documents; documents required to be kept by the laws of this land.

Administration

The Company daily operations including (but not limited to) internal telephone lists, address lists, company policies, company contracts; internal staff correspondence.

CATEGORIES OF RECORDS THAT ARE AVAILABLE WITHOUT REQUEST

Certain records are available without needing to be requested in terms of the request procedures set out in PAIA and provided for in this Manual.

This information may be inspected, collected, purchased or copied (at the prescribed fee for reproduction) at the Company's offices;



CATEGORIES OF DATA SUBJECTS AND THEIR PERSONAL INFORMATION

Clients – Natural Persons

Names, contact details, postal address, date of birth, ID number, Tax related information, nationality, gender, confidential correspondence

Clients – Juristic Persons / Entities

Names of contact persons, Name of Legal Entity, Physical and Postal address and contact details, Registration Number, Founding documents, Tax related information, authorised signatories

Service Providers

Names of contact persons; Name of Legal Entity, Physical and Postal address and contact details, Registration Number, Founding document, Tax related information, authorised signatories, beneficiaries, ultimate beneficial owners

Suppliers

Names of contact persons; Name of Legal Entity, Physical and Postal address and contact details, Registration Number, Founding document, Tax related information, authorised signatories, beneficiaries, ultimate beneficial owners

Employees / Directors

Gender, Pregnancy, Marital Status, Ethnicity, Age, Language, Education information, Financial Information, Employment History, ID number, Physical and Postal address, Contact details, Criminal behaviour, Well-being

CATEGORIES OF RECIPIENTS PROCESSING THE PERSONAL INFORMATION

The Company, its affiliates and their respective representatives are recipients of Personal Information.

The Company may supply Personal Information to service providers who render some of the following services:

- Insurance related services as delegated and / or authorised by the Company;
- Capturing and organising of data;
- Storing of data;
- Sending of emails and other correspondence to clients.