1. INTERPRETATION

1.1 In this manual, clause headings are for convenience and shall not be used in its interpretation unless the context clearly indicates a contrary intention -

2.1.1.1 an expression which denotes – any gender includes the other genders;
2.1.1.2 a natural person includes an artificial or juristic person and vice versa;
2.1.1.3 the singular includes the plural and vice versa;

2.2 the following expressions shall bear the meanings assigned to them below and cognate expressions bear corresponding meanings –

2.2.1 "**Sureplan Insurance Consultants"** – means a 'private body' for purposes of this Act;

2.2.2 "**Act**" - Promotion of Access to Information Act No. 2 of 2000, as amended from time to time including the regulations promulgated in terms of the Act;

2.2.3 "**business day**" - any day other than a Saturday, Sunday or official public holiday in the Republic of South Africa;

2.2.4 **"head**" – the managing director of Sureplan Insurance Consultants;

2.2.5 "**information officer**" - the person duly authorised by the head and appointed by Sureplan Insurance Consultants to facilitate or assist the head with any request in terms of the Act;

2.2.6 **"manual"** - this manual together with all of its annexures, as amended from time to time.

2.2.7 "**personal information**" - means information relating to an identifiable natural person, including, but not limited to

2.2.7.1 information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person.

2.7.7.2 information relating to the education or the medical, financial, criminal or employment history of the person.

2.7.7.3 any identifying number, symbol, email address, physical address, telephone number, location information, online identifier or other particular assigned to the person.

2.7.7.4 the biometric information of the person.

2.7.7.5 the personal opinions, views or preferences of the person.

2.7.7.6 correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence.

2.7.7.7 the views or opinions of another individual about the person; and

2.7.7.8 the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person,

2.7.7.9 but excludes information about an individual who has been dead for more than 20 years

2.2.8 "**POPIA**" – means the Protection of Personal Information Act No.4 of 2013.

2.2.9 "**Regulator**" – means the Information Regulator (South Africa);

2.3 any reference to any statute, regulation or other legislation shall be a reference to that statute, regulation or other legislation as at the signature date, and as amended or substituted from time to time;

2.4 if any provision in a definition is a substantive provision conferring a right or imposing an obligation on any party then, notwithstanding that it is only in a definition, effect shall be given to that provision as if it were a substantive provision in the body of this manual;

2.5 a reference to a party shall include a reference to that party's successors and assigns;

2.6 a reference to a document includes a reference to an amendment or supplement to or to a replacement or novation of that document;

2.7 where any term is defined within a particular clause other than this, that term shall bear the meaning ascribed to it in that clause wherever it is used in this manual;

2.8 where any number of days is to be calculated from a particular day, such number shall be calculated as excluding such particular day and commencing on the next day. If the last day of such number so calculated falls on a day which is not a business day, the last day shall be deemed to be the next succeeding day which is a business day;

2.9 any reference to days (other than a reference to business days), months or years shall be a reference to calendar days, months or years, as the case may be;

2.10 the use of the word "including" followed by a specific example/s shall not be construed as limiting the meaning of the general wording preceding it and the eiusdem generis rule shall not be applied in the interpretation of such general wording or such specific example/s; and

2.11 insofar as there is a conflict in the interpretation of or application of this manual and the Act, the Act shall prevail

2. PURPOSE OF THE PAIA MANUAL

This PAIA Manual is useful for the public to-

1.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;

1.2 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;

1.3 know the description of the records of the body which are available in accordance with any other legislation;

1.4 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;

1.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;

1.6 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;

1.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;

1.8 know the recipients or categories of recipients to whom the personal information may be supplied;

1.9 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

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

3.1 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.

3.2 The Guide is available in each of the official languages and in braille.

3.3 The aforesaid Guide contains the description of-

3.3.1 the objects of PAIA and POPIA;

3.3.2 the postal and street address, phone and fax number and, if available, electronic mail address of-

3.3.2.1 the Information Officer of every public body, and

3.3.2.2 every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA[1] and section 56 of POPIA[2];

3.3.3 the manner and form of a request for-

3.3.3.1 access to a record of a public body contemplated in section 11[3]; and

3.3.3.2 access to a record of a private body contemplated in section 50[4];

3.3.4 the assistance available from the IO of a public body in terms of PAIA and POPIA;

3.3.5 the assistance available from the Regulator in terms of PAIA and POPIA;

3.3.6 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-

3.3.6.1 an internal appeal;

3.3.6.2 a complaint to the Regulator; and

3.3.6.3 an application with a court against a decision by the information officer

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[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.*

[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.

3.3.6.4 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;

3.3.7 the provisions of sections 14[5] and 51[6] requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;

3.3.8 the provisions of sections 15[7] and 52[8] providing for the voluntary disclosure of categories of records by a public body and private body, respectively;

3.3.9 the notices issued in terms of sections 22[9] and 54[10] regarding fees to be paid in relation to requests for access; and

3.3.10 the regulations made in terms of section 92[11].

3.4 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.

3.5 The Guide can also be obtained-

3.5.1 upon request to the Information Officer ;

3.5.2 from the website of the Regulator (inforegulator.org.za)

3.5.3 Contact details for the Information Regulator-

• Postal Address:	P.O. Box 31533 Braamfontein 2017
• Physical Address:	The Information Regulator (South Africa) JD House, 27 Stiemens Street Braamfontein Johannesburg 2001
• Email address:	PAIA.IR@justice.gov.za

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[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.*

[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."

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

4. WHO MAY REQUEST INFORMATION IN TERMS OF THE ACT

5.1. Any person who requires information for the exercise or protection of any rights, may request information from a private body. Section 50 of the Act states that-

a) that record is required for the exercise or protection of any rights;

b) that person complies with the procedural requirements in this Act 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.

5.2. A requester is any person making a request for access to a record of Sureplan Insurance Consultants. There are two types of requesters –

5.2.1. **Personal Requester**

Personal requester is a requester who is seeking access to a record containing personal information about the requester. Sureplan Insurance Consultants will voluntarily provide the requested information or give access to any record with regard to the requester's personal information. The prescribed fee for reproduction of the information requested may be charged where applicable.

5.2.2. **Other Requester**

This requester (other than a personal requester) is entitled to request access to information on third parties. However, Sureplan Insurance Consultants is not obliged to voluntarily grant access. The requester must fulfil the prerequisite requirements for access in terms of the Act, including the payment of a request and access fee where applicable

5. PROCEDURES FOR OBTAINING ACCESS

5.1 Key Contact Details for Access to Information

5.1.1 Any person who wishes to request any information from Sureplan Insurance Consultants with the object of protecting or exercising a right may contact the information officer or deputy information officers:

a) Information Officer: Andrew Neville Wright

b) Deputy Information Officers: Andrew Neville Wright

5.1.2 The contact details for the Information officer and deputy information officers are set out below:

Tel:	011 462 2692/3
Email address:	andrew@sureplan.co.za
Website:	www.sureplan.co.za
Physical Address:	10 Kwarts Avenue; Juskei Park; 2153

5.2 Prescribed Access Form

5.2.1 In terms of section 53 of the Act, a request for access to a record of Sureplan Insurance Consultants must be made in the prescribed form (attached hereto as Annexure 2) to Sureplan Insurance Consultants at the address or electronic mail address given above. The form requires the requestor to provide the following information:

a) sufficient information to enable the information officer to identify the requestor;
b) sufficient information to enable the information officer to identify the record(s) requested;
c) the form of access required;
d) the requestor's postal address, email address, or fax number;
e) identification of the right sought to be exercised or protected;
f) an explanation on why the record is required to exercise or protect that right;
g) the manner in which the requestor wishes to be informed of the decision on the request, if in a manner in addition to written notification; and
h) if the request is made on behalf of a person, the submission of proof of the capacity in which the requestor makes the request, to the satisfaction of the information officer.

5.2.2 Sureplan Insurance Consultants will process the request within 30 days, unless the requestor has stated special reasons which would satisfy the Information Officer that circumstances dictate that the above time period is not to be complied with.

5.2.3 The requester shall be informed whether access has been granted or denied in writing.

5.2.4. If, in addition, the requester requires the reasons for the decision in any other manner, he must state the manner and the particulars so required.

5.2.5 If an individual is unable to complete the prescribed form because of illiteracy or disability, such a person may make the request orally.

5.2.6. The requester must pay the prescribed fee, before any further processing can take place.

5.2.7 Requestors should note that all of the information as listed above should be provided, failing which the process will be delayed while the private body requests such additional information. The prescribed time periods will not commence until all pertinent information has been furnished to the private body by the requestor.

5.2.8. Records held by Sureplan Insurance Consultants may be accessed by requests only once the prerequisite requirements for access have been met.

5.3 PRESCRIBED FEES

5.3.1. Payment of fees is regulated in terms of section 54 of the Act. The Regulations to the Act provide for two types of fees –

a) **Request Fee**

This is a non-refundable administration fee paid by all requestors with the exclusion of personal requestors. It is paid before the request is considered.

b) **Access Fee**

This is paid by all requestors only when access is granted. This fee is intended to reimburse the private body for the costs involved in searching for a record and preparing it for delivery to the requestor.

5.3.2. The information officer must give written notice to a requestor other than a personal requestor of the request fee and amount to be paid before the request may be further processed.

5.3.3 If in the information officer's opinion the search for a record, or preparation of the record for disclosure will require more than the prescribed hours, the information officer may require the requestor to pay a deposit, not being more than one third of the access fee that would be payable if the request is granted. If the request is declined, the deposit must be repaid to the requestor.

5.3.4 The notice given by the information officer must advise the requestor that s/he has a right to apply to court against the payment of the request fee or deposit, and also advise of the procedure of the application.

5.3.5 The Information Officer shall withhold a record until the requester has paid the fees as indicated in Annexure 3 attached hereto

5.3.6. If a deposit has been paid in respect of a request for access, which is refused, then the Information Officer concerned must repay the deposit to the requester.

6. TYPES OF RECORDS

6.1 Records That Are Automatically Available in Terms of Section 51(1)(b)(ii) Of the Act

The following records are automatically available without a person having to request access in terms of the Act.

Category of Records	Types of Records	Available on Website	Available on request
Product and marketing Information	Information on all products, benefits and services that are publicly available such as brochures, advertisements and media statements.		x
Customer Information	Information for specific customers in relation to any service provided by the company to such customer and includes Personal and policy information. Subject to the applicable legislation		x
Policies & Procedures	Policies and procedures that must be made available in accordance with legislation, which include but is not limited to the Privacy Policy, PAIA Manual and Conflict of Interest Management Policy		x
Statutory Information	Any information that must be made available in accordance with legislation		x

6.2 Records Which Are Available in Accordance with Any Other Legislation in Terms of Section 51(1)(b)(iii)

Category of Records	Applicable Legislation
Memorandum of incorporation	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000
Financial Services Licence	Financial Advisory and Intermediary Services Act 37 of 2002

6.3 Records held by Sureplan Insurance Consultants and available as contemplated in Section 51(1)(b)(iv) of the Act

The table below contains a description of the types of records / subjects which Sureplan Insurance Consultants holds, and the categories of records held on each subject. These records are not automatically available without a request in terms of PAIA. A request made in terms of PAIA for records in any of the categories below may be refused in accordance with any of the grounds of refusal as set out in PAIA.

Category of Records	Description
Human Resources	any personal records of personnel and next of kin conditions of employment internal evaluation records related correspondence
Policyholder records	a policyholder includes any natural or juristic entity any personal records of policyholders records generated by Sureplan Insurance Consultants and the third parties it authorise
Operational records	Financial, operational, marketing, IT and other relevant records generated by Sureplan Insurance Consultants

7. INFORMATION REQUESTED ABOUT A THIRD PARTY

7.1 Sureplan Insurance Consultants may possess records pertaining to other parties, including without limitation, contractors, suppliers, subsidiary/holding/sister companies, joint venture companies, service providers. Alternatively, such other parties may possess records which can be said to belong to Sureplan Insurance Consultants. The following records fall under this category –

7.1.1 Personnel, customer or private body records which are held by another party as opposed to being held by Sureplan Insurance Consultants ; and

7.1.2 Records held by Sureplan Insurance Consultants pertaining to other parties, including without limitation financial records, correspondence, contractual records, records provided by the other party, and records third parties have provided about the contractors / suppliers.

7.2 Section 71 of the Act makes provision for a request for information or records about a third party.

7.3 In considering such a request, Sureplan Insurance Consultants will adhere to the provisions of sections 71 to 74 of the Act.

7.4 The attention of the requester is drawn to the provisions of Chapter 5, Part 3 of the Act in terms of which Sureplan Insurance Consultants is obliged, in certain circumstances, to advise third parties of requests lodged in respect of information applicable to or concerning such third parties. In addition, the provisions of Chapter 2 of Part 4 of the Act entitle third parties to dispute the decisions of the head or the request liaison officer by referring the matter to the High Court.

7.5 If the request is for a record pertaining to a third party, the information officer must take all reasonable steps to inform that third party of the request. This must be done within 21 days of receipt of the request. The manner in which this is done must be in the fastest means reasonably possible, but if orally, the information officer must thereafter give the third party a written confirmation of the notification. The third party may within 21 days thereafter either make representation to the private body as to why the request should be refused, alternatively grant written consent to the disclosure of the record. The third party must be advised of the decision taken by the information officer on whether to grant or decline the request and must also be advised of his/her/its right to appeal against the decision by way of application to court within 30 days after the notice.

8. Decision Making Process

8.1 In terms of Section 55, the information officer will take all reasonable steps to find a record that has been requested. If the record cannot be found or does not exist, the information officer must notify the requestor by way of affidavit or affirmation that it is not possible to give access to the record. This is deemed to be a refusal of the request. If, however, the record is later found, the requestor must be given access if the request would otherwise have been granted.

8.2 Section 56 provides that the information officer must within 30 days of receipt of a correctly completed request notify the requestor of the decision as to whether or not to grant the request.

8.3 If the request is –

9.2.1**. Granted:** the notification must state the applicable access fee required to be paid, together with the procedure to be followed should the requestor wish to apply to court against such fee, and the form in which access will be given.

9.2.2. **Declined**: the notification must include adequate reasons for the decision, together with the relevant provisions of the Act relied upon and provide the procedure to be followed should the requestor wish to apply to court against the decision.

8.4 The information officer may extend the period of 30 days by a further period not exceeding 30 days if –

9.3.1. the request is for a large number of records or requires a search through a large number of records and, without an extension, this search would interfere with the normal activities of the body concerned;

9.3.2. the request requires a search for records located in a different office of the private body not situated in the same city; 9.3.3. consultation between divisions of the private body, or with another private body is required; or

9.3.4. the requestor consents to the extension

9.4. The requestor must be notified within the initial 30-day period in writing of the extension, together with reasons therefor, and the procedure involved should the requestor wish to apply to court against the extension.

9.5. The information officer's failure to respond to the requestor within the 30-day period constitutes a deemed refusal of the request.

9.6. Section 59 provides that the information officer may sever a record and grant access only to that portion which the law does not prohibit access to.

9.7. If access is granted, access must be given in the form that is reasonably required by the requestor, or if the requestor has not identified a preference, in a form reasonably determined by the information officer.

10. GROUNDS FOR REFUSAL OF A REQUEST

10.1 Notwithstanding compliance with section 50, the request may be declined in accordance with one of the prescribed grounds in terms of the Act, namely –

10.1.1. Section 63 of the Act prohibits the unreasonable disclosure of the personal information of natural person to requestors. This includes the personal information of deceased persons. However, Section 63(2) does provide exceptions to this.

10.1.2. Section 64 states that a request must be refused if it relates to records containing information pertaining to –

a) trade secrets;

b) financial, commercial, scientific or technical information where disclosure would be likely to cause harm to the commercial or financial interests of that party; or

c) information supplied in confidence by a party, the disclosure of which could reasonably be expected to put the party at a disadvantage in contractual or other negotiations or prejudice the party in commercial competition.

10.1.3. The information must, however, be released if it pertains to the results of product or environmental testing, the disclosure of which would reveal a serious public safety or environmental risk.

10.1.4. Section 65 prohibits disclosure of information if such disclosure would constitute a breach of any duty of confidentiality owed to a party in terms of an agreement.

10.1.5. In terms of section 66, a private body must refuse a request for access to a record of the body if disclosure could reasonably be expected to –

a) endanger the life or physical safety of an individual;

b) prejudice or impair the security of a building, structure or system, including but not limited to a computer or communication system, means of transport or any other property

c) The private body may also refuse a request for access to information which would prejudice methods, systems, plans or procedures for the protection of an individual in accordance with a witness protection scheme or safety of the public.

10.1.6. Section 67 mandates the refusal of a request if the record is privileged from production in legal proceedings, unless the person entitled to the privilege has waived the privilege.

10.1.7. Section 68 pertains to records containing information about the private body itself and unlike the other provisions pertaining to decline of a request, is not mandatory, but rather discretionary. Sureplan Insurance Consultants may refuse access to a record if the record –

a) contains trade secrets of Sureplan Insurance Consultants;

b) contains financial, commercial, scientific or technical information, the disclosure of which would be likely to cause harm to the commercial or financial interests of Sureplan Insurance Consultants.

c) contains information which, if disclosed, could reasonably be expected to put the private body at a disadvantage in contractual or other negotiations, or prejudice Sureplan Insurance Consultants in commercial competition; or

d) consists of a computer program owned by Sureplan Insurance Consultants

10.1.8. Notwithstanding the above, the information must be released if it pertains to the results of product or environmental testing, the disclosure of which would reveal a serious public safety or environmental risk.

10.1.9. Section 69 prohibits the disclosure of information about research where disclosure is likely to expose the party, the person conducting the research on behalf of the party, or the subject matter of the research to serious disadvantage. Disclosure is discretionary if such research pertains to Sureplan Insurance Consultants itself.

10.1.10. Notwithstanding any of the above-mentioned provisions, section 70 Provides that a record must be disclosed if its disclosure would –

a) reveal evidence of a substantial contravention of or failure to comply with the law, imminent and serious public safety or environmental risk; and

b) if the public interest in the disclosure clearly outweighs the harm.

11. REMEDIES AVAILABLE WHEN SUREPLAN INSURANCE CONSULTANTS REFUSES A REQUEST FOR INFORMATION

11.1 Internal Remedies

Sureplan Insurance Consultants does not have internal appeal procedures. As such, the decision made by the Information Officer is final, and requestors will have to exercise such external remedies.at their disposal if the request for information is refused, and the requestor is not satisfied with the answer supplied by the Information Officer.

11.2 External Remedies

11.2.1. A requestor that is dissatisfied with the information officer's refusal to grant access to any information may, within 180 days of notification of the last decision, apply to court for relief. Likewise, a third party dissatisfied with the information officer's decision to grant a request may, within 180 days of notification of the last decision, apply to court for relief.

11.2.2. It should be noted that notwithstanding any provision in the Act, the court may examine the record(s) in question. No record may be withheld from the court on any grounds. The court may not, however, disclose the contents of the record(s).

11.2.3. The court is empowered to grant any order that is just and equitable, including:

a) confirming, amending or setting aside the information officer's decision

b) requiring the information officer to take any action, or refrain from taking any action as identified by the court within a specified period;

c) granting an interdict, interim or special relief, declaratory order or compensation; or costs.

12. PRIVACY PRACTICES

12.1. Should a data subject wish to object to the processing of personal information in terms of section 11(3)(a) of the POPI Act, an objection must be submitted to Sureplan Insurance Consultants on Form 1 attached to this policy as Annexure 1.

12.2. Should a data subject wish to request a correction or deletion of personal information or the destruction or deletion of a record of personal information in terms of section 24(1) of the POPI Act, a request must be submitted on Form 2 attached to this policy as Annexure 2.

12.3. Refer to our Privacy Policy or contact the Sureplan Insurance Consultants Information Officer should you need further information about our privacy practices; wish to withdraw consent or correct personal information.

12.4. Purpose of Processing Personal Information

12.4.1. For the purpose of our business functions and activities we will process personal information which includes but is not limited to name, identity or registration number, address, contact information, banking details, insurance risk and all related information, claims history and detail and credit information for the following non exhaustive list of purposes:

- Quoting, underwriting, pricing, servicing and executing of insurance and other financial services
- Assessment of financial and insurance risks;
- Assessment and processing of claims and complaints;
- Development and improvement of products and services;
- Credit references and/or verification of personal information;
- Fraud prevention and detection;
- Market research, customer experience surveys and statistical analysis;
- Audit & record keeping;
- Compliance with legal & regulatory requirements;
- Sharing of information with service providers and other third parties we engage to process such information on our behalf or who render services to us; and
- Sharing of insurance and claims information with other insurers and industry bodies for legitimate reasons such as fraud prevention and claims validation.

12.5 Sureplan Insurance Consultants will will only process personal information if any one or more of the following apply:

12.5.1.1 Sureplan Insurance Consultants has consent to process personal information;

12.5.1.2 if it is necessary to conclude or perform under a contract;

12.5.1.3 if it is required by law to do so; and/or

12.5.1.4 if it is necessary to protect or pursue a legitimate interest

12.6 Sureplan Insurance Consultants, where required, share personal information with the following parties. These parties are obliged to keep your personal information secure and confidential:

12.6.1 Sureplan Insurance Consultants employees, as required by their employment conditions;

12.6.2 insurers, brokers, other financial institutions or other organisations that assist with insurance and assurance underwriting, the providing of insurance and assurance policies and products, the assessment of insurance and assurance claims, and other related purposes;

12.6.3 our service providers, agents and sub-contractors we use to offer and provide services;

12.6.4 payment processing services providers, merchants, banks and other persons that assist with the processing of payment instructions;

12.6.5 credit bureaus;

12.6.6 attorneys and other persons that assist with the enforcement of agreements;

12.6.7 regulatory authorities, industry ombudsmen and other persons the law requires us to share personal information with;

12.6.8 law enforcement and fraud prevention agencies, and other persons tasked with the prevention and prosecution of crime;

12.6.9 courts of law or tribunals that require the personal information to adjudicate referrals, actions or applications;

12.6.10 persons to whom we have ceded our rights or delegated its obligations to under agreements, such as where a business is sold; and/or

12.6.11 our partners with whom we have concluded business agreements.

12.7 Planned transborder flows of personal information

12.7.1 In order to provide the products and services offered Sureplan Insurance Consultant it may be required that we transfer your Personal Information to countries outside the borders of South Africa. Sureplan Insurance Consultants will only transfer personal information to third parties outside the borders of South Africa in the following circumstances:

12.7.1.1 where personal information will be adequately protected under the other country's laws or an agreement with the third-party recipient;

12.7.1.2 where the transfer is necessary to enter into, or perform, under a contract or a contract with a third party that is in your interest;

12.7.1.3 where consent for the transfer has been obtained; and/or

12.7.1.4 where it is not reasonably practical to obtain consent, and the transfer is in your interest.

12.7.2 The Personal Information shared will be limited to the information required to fulfil the products and services, and the transfer will happen within the requirements of the law.

12.7.3 Sureplan Insurance Consultants will ensure that the party processing your personal information in the other country will agree to apply the same level of protection as available by law in your country, or if the other country's laws provide better protection, the other country's laws would be agreed to and applied.

12.8 Information Security Measures to be implemented by Sureplan Insurance Consultants to ensure the confidentiality, integrity and availability of information

12.8.1 Sureplan Insurance Consultants has deployed state of the art technology and implemented security measures to protect against the loss, misuse, or alterations of the Information under our control, by unauthorised third parties. Sureplan Insurance Consultants is committed to providing secure services.

12.8.2 Sureplan Insurance Consultants contracts with third parties, appropriate security, privacy and confidentiality obligations are imposed on them to ensure that personal information is kept secure.

12.8.3 Sureplan Insurance Consultants regularly tests the effectiveness of the security of our systems and responds to any threats that may be detected.

12.8.4 No data transmission over the Internet can be guaranteed to be 100% secure, and Sureplan Insurance Consultants does not warrant that your information will be secure but confirm that all reasonable security safeguards will always be in place which includes but is not limited to physical security, password protection, encryption, firewalls and ongoing monitoring.

13. Availability of the manual

a. A copy of the Manual is available-

   i. On www.sureplan.co.za if any;

   ii. At the head office of Sureplan Insurance Consultants for public inspection during normal business hours;

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

   iv. to the Information Regulator upon request.

b. A fee for a copy of the Manual, as contemplated in annexure 3 of the Regulations, shall be payable per each A4-size photocopy made.

14. UPDATING OF THE MANUAL

The head of a Sureplan Insurance Consultants will on a regular basis update this manual.

DISCLAIMER
The manual does not purport to be exhaustive of or to comprehensively deal with every procedure provided for in the Act. A requester is advised to familiarise him/her/itself with the provisions of the Act before lodging any request with Sureplan Insurance Consultants

Issued by
Andrew Wright
Broker / Key Individual