



PROMOTION OF ACCESS TO INFORMATION ACT MANUAL

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

1. LIST OF ACRONYMS AND ABBREVIATIONS

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| 1.1 | “KI” | Key Individual; |
| 1.2 | “IO” | Information Officer; |
| 1.3 | “Minister” | Minister of Justice and Correctional Services; |
| 1.4 | “PAIA” | Promotion of Access to Information Act No. 2 of 2000 (as amended); |
| 1.5 | “POPIA” | Protection of Personal Information Act No.4 of 2013; |
| 1.6 | “Regulator” | Information Regulator; and |
| 1.7 | “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

3.1. Key Individual

Name: Norman Noland
Tel: 021-658 6600
Email: info@gsfin.co.za

3.2. Chief Information Officer

Tel: 011-462 3393
Email: info@gsfin.co.za

3.3 General Contacts

Email: info@gsfin.co.za

3.4 National or Head Office

Physical Address: Sable Corner, Bridgeways, Precinct, 15 Bridgeway,
Century City, Cape Town, 7441
Telephone: 021- 6586600
Email: info@gsbin.co.za
Website: www.gsbin.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;
 - 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

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.*

- 4.3.3.2. 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;
- 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 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.

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.

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 and relevant forms can also be obtained-

4.5.1. upon request to the Information Officer;

4.5.2. from the website of the Regulator (<https://info regulator.org.za/>).

5. CATEGORIES OF RECORDS WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Category of records	Types of records	Available on website	Available upon request
Policyholders' own information and records.	Policy schedule, policy documents, disclosure notices, claims information, debit order details, record of advices.	No	Yes
Public information about us	Company name, addresses, contact details, background information, regulatory compliance status.	Yes	Yes
Insurance product Information	Information about insurance products available for purchase from GS Financial Services	Yes	Yes
Regulatory procedures	GS Financial Services' Privacy Policy i.t.o. POPIA, Conflict of Interest Management Policy,	Yes	Yes

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.”

	Complaints Procedures and Code of Conduct.		
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6. DESCRIPTION OF THE RECORDS WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Category of records	Applicable legislation
Memorandum of incorporation	Companies Act 71 of 2008
PAIA	Promotion of Access to Information Act 2 of 2000
POPIA	Protection of Personal Information Act (POPI Act)
Financial Information	Various, including but not limited to Companies Act, Insurance legislation, tax legislation etc
Any information which must be made available to a specific public or private body by reason of statute, law or court order.	

7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT

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
Policyholder record	<ul style="list-style-type: none"> - Insured personal information - Insured property - Claims records - Records of advice

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

The purpose of processing personal information is detailed in our Privacy Policy in terms of the Protection of Personal Information Act (POPI Act), which is available for download on our website at www.gsfin.co.za

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

The categories of data subjects in respect of who we processes personal information, and the nature or categories of the personal information being processed are listed as follows:

Categories of Data Subjects	Personal Information that may be processed
Clients, (prospective, current and past clients)	Name, address, registration numbers or identity numbers, employment status, bank details, insured assets, claims history and records of advice.
Service Providers	Names, registration number, vat numbers, address, trade secrets and bank details
Employees	Address, qualifications, employment history, gender and race

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

Category of personal information	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

Category of personal information	Categories of recipients to whom the personal information may be supplied
Credit and payment history, for credit information	Credit Bureaus
Insurance risk information	Various insurers where we have valid Agreements.
Insurance risk information	Our external Compliance Officer, in terms of an agreement where this service provider monitors our regulatory compliance.

8.4 Planned transborder flows of personal information

We make use of secure cloud storage to store and manage data, information and communications. Some of these platforms are managed for us by local computer specialist servicing provider in terms of a properly formatted service level agreement.

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

We utilise best practice with regards to security safeguards, to ensure the confidentiality and integrity of the personal information under our care. This includes:

- Password protected local computers.
- Secure, password protected cloud based storage.
- Up to date internet security software.
- Regular IT security staff training.
- Regular data back-ups – live daily cloud backup, and weekly local back-ups.
- 24 hour armed response physical security at office premises.
- Signed “Protection of Personal Information” agreements with all service providers who have legitimate reasons to have access and manage personal information.

9. AVAILABILITY OF THE MANUAL

9.1 A copy of this Manual is available-

9.1.1 on www.gsfin.co.za

- 9.1.2 from the head office 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 at www.inforegulator.org.za

10. UPDATING OF THE MANUAL

The Information Officer will on a regular basis update this manual.