

Insight Actuaries and Consultants (Pty) Limited

(Registration Number: 2002/016023/07)

(the "Company")

MANUAL

Published in terms of section 51 of the

Promotion of Access to Information Act 2 of 2000

(the "Act")

Date of compilation: September 2020

Date of revision: September 2020 Updated:

September 2020



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1. Introduction

The Company is a Consulting Company providing Actuarial Services, Strategic Managed Care, Profiling, Benchmarking and Business Intelligence Services for clients predominantly in the HealthCare sector.

This Promotion of Access to Information Manual (“Manual”) provides an outline of the type of records and the personal information it holds, and explains how to submit requests for access to these records in terms of the Promotion of Access to Information Act 2 of 2000 (“PAIA ”). In addition, it explains how to access, or object to, personal information held by the Company, or request correction of the personal information, in terms of paragraphs 23 and 24 of the Protection of Personal Information Act 4 of 2013 (“POPIA”).



The PAIA and POPIA Acts give effect to everyone's constitutional right of access to information held by private sector or public bodies, if the record or personal information is required for the exercise or protection of any rights. If a public body lodges a request, the public body must be acting in the public interest.

Requests shall be made in accordance with the prescribed procedures, at the rates provided. The forms and tariff are dealt with in section 5.

1.1 Availability of this PAIA Manual

This manual is published on the Company website at www.insight.co.za or alternatively, a copy can be requested from the Information Officer (see contact details in section 2).

1.2 Availability of guides to the PAIA and POPIA

Requesters are referred to the regulators listed below. The South African Human Rights Commission has compiled, as contemplated in Section 10 of PAIA, which contains such information as may reasonably be required by a person who wishes to exercise any right contemplated in said Act.

Guides to the PAIA and POPIA Acts can be obtained and queries directed to:

PAIA	POPIA
South African Human Rights Commission Promotion of Access to Information Act Unit Research and Documentation Department Private Bag 2700 Houghton Johannesburg 2041	Information Regulator 33 Hoofd Street Forum III, 3 rd Floor, Braampark P O Box 1533 Braamfontein Johannesburg 2017
Telephone number: (011) 484 8300 Fax number: (011) 484 7146/7 Website : www.sahrc.org.za E-mail : PAIA@sahrc.org.za	Telephone number: 012 406 4818 Fax number: 086 500 335 Website: www.justice.gov.za/inforeg E-Mail: inforeg@justice.gov.za



2. Company contact details

Persons designated/duly authorised persons:

Information Officer	
Faheem Suban	
Postal address	Private Bag X17, Halfway House, 1685
Street address	Block J Central, Ground Floor, 400 16 th Road, Central Park, Midrand 1682
Telephone numbers	+27 11 541 0900
Electronic Mail Address	informationofficer@insight.co.za
Payments should be made to:	Insight Actuaries and Consultants (PTY) LTD

3. Company records

Records available in accordance with other legislation

The Company has records available in terms of various laws, including:

- Basic Conditions of Employment Act 75 of 1997
- Broad-Based Black Economic Empowerment Act 53 of 2003
- Companies Act 71 of 2008
- Consumer Protection Act 68 of 2008
- Compensation for Occupational Injuries and Disease Act 130 of 1993
- Electronic Communications and Transactions Act 25 of 2002
- Employment Equity Act 55 of 1998
- Income Tax Act 58 of 1962
- Labour relations Act 66 of 1995
- Medical Schemes Act 131 of 1998
- National Credit Act 34 of 2005
- Prevention of Organised Crime Act 121 of 1998
- Prevention and Combating of Corrupt Activities Act 12 of 2004
- Promotion of Access to Information Act 2 of 2000
- Skills Development Act 9 of 1999
- Unemployment Insurance Act 63 of 2001
- Value Added Tax Act 89 of 1991

Access to these records are subject to the provisions laid out in paragraphs 5 and 6 of this Manual.



3.1 Company record classification key

CLASSIFICATION NO	ACCESS	CLASSIFICATION
1	May be Disclosed	Public Access Document
2	May not be Disclosed	Request after commencement of criminal or civil proceedings [s7]
3	May be Disclosed	Subject to copyright
4	Limited Disclosure	Personal Information that belongs to the requester of that information [s61]
5	May not be Disclosed	Unreasonable disclosure of personal information Natural person [s63(1)] or Juristic Person (POPI)
6	May not be Disclosed	Likely harm the commercial or financial interest of third party [s64(a)(b)]
7	May not be Disclosed	Likely to harm the company or third party in contract or other negotiations [s64(c)]
8	May not be Disclosed	Would breach a duty of confidence owed to a third party in terms of an Agreement [s65]
9	May not be Disclosed	Likely to compromise the safety of individuals or protection of property [s66]
10	May not be Disclosed	Legally privileged document [s67]
11	May not be Refused	Environmental testing/investigation which reveals public safety / environmental risk [s64(2); s68(2)]
12	May not be Disclosed	Commercial information of Private Body [s68]
13	May not be Disclosed	Likely to prejudice research and development information of the Company or a third party [s69]
14	May not be Refused	Disclosure in public interest [s70]

3.3 Summary: records available

DEPARTMENTAL RECORDS	SUBJECT	CLASSIFICATION NO.
Governance	Board and Management Records	12
	Policies and Procedures	
	Management Reports	
	Minutes of Meetings	
	Resolutions	
Finance	Auditor's reports	12
	Audited Financial statements	
	Tax Records (Company & Employees)	
	Asset Register	
	Management Accounts	
	Employee Records	
	Employee Contracts	
	Banking records	
Legal	Invoices	4,5
	General Contract Documentation	
	Company Guidelines, Policies and Procedures	
	Statutory and Environmental Records	



Sales and Marketing	Market Information	12,13
	Product Brochures	1
	Customer Information Database	4, 12
	Performance Records	12
	Product Sales Records	1
	Marketing and Future Product Strategies	12
	Current Product Information	1,4
	Public Corporate Records	1
	Media Releases and Event recordings	1
	Supply Chain database	4,5, 12
Other Party Records	Personnel, client, or private body records which another party holds, as opposed to the records Insight holds	4,12, 13

4. Processing of personal information

The Company takes the privacy and protection of personal information very seriously and will only process personal information in accordance with the current South African privacy legislation. Accordingly, the relevant personal information privacy principles relating to the processing thereof (including, but not limited to, the collection, handling, transfer, sharing, correction, storage, archiving and deletion) will be applied to any personal information processed by the Company.

4.1 The purpose of processing of personal information by the Company

We process personal information for a variety of purposes, including but not limited to the following:

- to provide or manage any information, products and/or services requested by Responsible Parties;
- to help us identify data subjects when they contact the Company
- to maintain customer records;
- for recruitment purposes;
- for employment purposes;
- for travel purposes;
- for general administration, financial and tax purposes;
- for legal or contractual purposes;
- for health and safety purposes;
- to monitor access, secure and manage our premises and facilities;
- to transact with our suppliers and business partners;
- to help us improve the quality of our products and services;
- to identify other products and services which might be of interest to Responsible Parties.



4.2 Categories of data subjects and personal information processed by the Company

Categories of data subjects and personal information processed by the Company include the following:

CATEGORIES OF DATA SUBJECTS	PERSONAL INFORMATION PROCESSED
Customers and potential customers	Contact information of interfacing employees
	Contracts
	Location information
	Data provided by Responsible Parties for actuarial analysis and reporting
Suppliers	Personal information of supplier
	Personal information of supplier representatives
Employees	Personal information
	Medical information, including disability information where provided.
	Employee spousal / partner information
	Employee Pension and Provident Fund Information
	Employment contracts
	Employee performance records
	Payroll records
	Electronic access records
	Physical access records
	Surveillance records
	Health and safety records
	Training records
	Employment history
	Time and attendance records
Job applicants	Curriculum vitae and application forms
	Criminal checks
	Background checks
Children	Personal information
	Medical information
Visitors	Physical access records
	Personal Information
	Electronic access records and scans
	Surveillance records
In-patriates and ex-patriates	In-patriate and ex-patriate personal information
	In-patriate and ex-patriate children's personal information

4.3 Recipients or categories of recipients with whom personal information is shared

We may share the personal information of our data subjects for any of the purposes outlined in Section 4.1, with the following:

- our other Group Companies in South Africa and in other countries
- our service providers and agents who perform services on our behalf.

We do not share the personal information of our data subjects with any third parties, unless we have your explicit consent to do so and where:

- we are obliged to provide such information for legal or regulatory purposes;
- we are required to do so for purposes of existing or future legal proceedings



- we are selling one or more of our businesses to someone to whom we may transfer our rights under any customer agreement we have with you;
- we are involved in the prevention of fraud, loss, bribery or corruption;
- they perform services and process personal information on our behalf;
- this is required to provide or manage any information, products and/or services to data subjects; or
- needed to help us improve the quality of our products and services.

We will send our data subjects notifications or communications if we are obliged by law, or in terms of our contractual relationship with them.

We will only disclose personal information to government authorities if we are required to do so by law.

Our employees, sub-contractors and business partners are required to adhere to data privacy legislation.

4.4 Information security measures to protect personal information

Reasonable technical and organisational measures have been implemented for the protection of personal information processed by Insight and its operators. In terms of POPIA, operators are third parties that process personal information on behalf of the Company.

We continuously implement and monitor technical and organisational security measures to protect the personal information we hold, against unauthorised access, as well as accidental or wilful manipulation, loss or destruction.

We will take steps to ensure that operators that process personal information on behalf of the Company apply adequate safeguards as outlined above.

4.5 Trans-border flows of personal information

We will only transfer personal information across South African borders if the relevant business transactions or situation requires trans-border processing, and will do so only 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.

We will take steps to ensure that operators are bound by laws, binding corporate rules or binding agreements that provide an adequate level of protection and uphold principles for reasonable and lawful processing of personal information, in terms of POPIA.

We will take steps to ensure that operators that process personal information in jurisdictions outside of South Africa, apply adequate safeguards as outlined in Section 4.4.

5. Form of request

To facilitate the processing of your request, kindly:

- 5.1 Use the prescribed form, available on the website of the Company at the following address www.insight.co.za
- 5.2 Address your request to the Information Officer at Informationofficer.co.za. Provide sufficient details to enable the Company to identify:
 - a) The record(s) requested;



- b) The requester (and if an agent is lodging the request, proof of capacity);
- c) The form of access required;
- d) The postal address, email address or fax number of the requester in the Republic;
- e) If the requester wishes to be informed of the decision in any manner (in addition to written) the manner and particulars thereof;
- f) The right which the requester is seeking to exercise or protect with an explanation of the reason the record is required to exercise or protect the right.

6. Prescribed fees

The following requirements applies to requests (other than personal requests):

- A requestor is required to pay the prescribed fees (R50.00) before a request will be processed;
- If the preparation of the record requested requires more than the prescribed hours (six), a deposit shall be paid (of not more than one third of the access fee which would be payable if the request were granted);
- A requestor may lodge an application with a court against the tender/payment of the request fee and/or deposit;
- Records may be withheld until fees have been paid; and
- The Fee Structure is available on the Company website at www.insight.co.za.

7. Remedies

The Company does not have internal appeal procedures regarding PAIA and POPIA requests. As such, the decision made by the duly authorised persons in section 2, is final. If a request is denied, the requestor is entitled to apply to a court with appropriate jurisdiction, or the Information Regulator (once established), for relief.



Annexure A Prescribed PAIA Access Form

REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY
(Section 53(1) of the Promotion of Access to Information Act, 2000
(Act No. 2 of 2000))

[Regulation 10]

A. Particulars of private body

The Head/Designated Person: _____

B. Particulars of person requesting access to the record

- (a) The particulars of the person who requests access to the record must be given below.
- (b) The address and/or fax number in the Republic to which the information is to be sent must be given.
- (c) Proof of the capacity in which the request is made, if applicable, must be attached.

Full names and surname: _____

Identity number: _____

Postal address: _____

Fax number: _____ Telephone number: _____

E-mail address: _____

Capacity in which request is made, when made on behalf of another person:

C. Particulars of person on whose behalf request is made

This section must be completed ONLY if a request for information is made on behalf of another person.

Full names and surname: _____

Identity number: _____

D. Particulars of record

(a) Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located. (b) If the provided space is inadequate, please continue on a separate folio and attach it to this form. **The requester must sign all the additional folios.**

1. Description of record or relevant part of the record: _____

2. Reference number, if available: _____



Annexure B: Fees

Copies of this PAIA manual

□ Copies of this manual are R1.10 for every A4 page.

Reproduction fees:

Type of Record	Fees
Every photocopy of an A4 page	R1.10
Every printed copy of an A4 page from a computer or in electronic or computer-readable form	
For a copy in a computer-readable form on: <ul style="list-style-type: none"> • Compact Disk • USB 	R70.00 R100.00
A transcript of visual images for an A4 page	R20.00
To search for a record that must be disclosed (per hour or part thereof reasonably required for searching)	RR30.00 per hour
If a copy or a record needs to be posted, the requestor has to pay the actual postal fee	Postage cost charged

Request fees:

If a requester submits a legitimate request for access to information from Insight Actuaries and Consultants about someone other than the requester, they have to pay a request fee of R50.00 upfront.

Access fees:

An access fee applies in all instances where we grant a request for access to information, except in those instances where payment of an access fee is specifically excluded in terms of the Act or the Minister determines an exclusion in terms of Section 54(8) of the Act.

Type of Record	Fees
Every photocopy of an A4 page	R1.10
Every printed copy of an A4 page from a computer or in electronic or computer-readable form	
For a copy in a computer-readable form on: <ul style="list-style-type: none"> • Compact Disk • USB 	R70.00 R100.00
A transcript of visual images for an A4 page	R20.00
To search for a record that must be disclosed (per hour or part thereof reasonably required for searching)	RR30.00 per hour
If a copy or a record needs to be posted, the requestor has to pay the actual postal fee	Postage cost charged



Annexure C: Form for objecting to the processing of personal information

Form 1 – Objection to the processing of personal information

In terms of Section 11(3) of the Protection of Personal Information Act 4 of 2013 and Regulations relating to the protection of personal information, 2018 [Regulation 2]

Note:

- 1. You may attach affidavits or other documentary evidence to support the objection.
- 2. If the space provided in this form is inadequate, submit information as an annexure to this form and sign each page.
- 3. Complete what applies to you.

A. Details of data subject:

Name(s) and surname/registered name of data subject _____

Unique identifier or identity number _____

Residential, postal or business address _____

_____ Code _____

Contact number(s) _____

Email address _____

B. Details of the responsible party:

Name(s) and surname/registered name of responsible party _____

Residential, postal or business address _____

_____ Postal Code _____

Contact number(s) _____

Email address _____

C. Reasons for objection in terms of Section 11(1)(d) to (f):

(Please provide detailed reasons for the objection) _____

Signed at _____ this _____ day of _____ 20 _____

Signature of data subject/designated person



Annexure D: Form for correcting or deleting personal information and deleting or destroying records of personal information

Form 2 – Request for correction or deletion of personal information or destroying or deletion of record of personal information

In terms of Section 24(1) of the Protection of Personal Information Act 4 of 2013 and Regulations relating to the protection of personal information, 2018 [Regulation 3]

Note:

1. You may attach affidavits or other documentary evidence to support the objection.
2. If the space provided in this form is inadequate, submit information as an annexure to this form and sign each page.
3. Complete what applies to you.

Request for:

Mark the appropriate box with an "X"	
Correction or deletion of the personal information about the data subject that the responsible party possesses or controls.	
Destroying or deletion of a record of personal information about the data subject that the responsible party possesses, or controls and the responsible party is no longer authorised to retain the record of information	

A. Details of data subject:

Name(s) and surname/registered name of data subject _____

Unique identifier or identity number _____

Residential, postal or business address _____

_____ Code _____

Contact number(s) _____

Email address _____

B. Details of the responsible party:

Name(s) and surname/registered name of responsible party _____

Residential, postal or business address _____

_____ Code _____

Contact number(s) _____



D. Reasons for correcting or deleting the personal information about the data subject in terms of Section 24(1)(a) that the responsible party possesses and controls,

and/or

Reasons for destroying or deleting a record of personal information about the data subject in terms of Section 24(1)(b) that the responsible party is no longer authorised to retain:

(Please provide detailed reasons for the request)

Signed at _____ this _____ day of _____ 20 _____

Signature of data subject/designated person