



intergrated

INSURANCE  
ADMINISTRATORS

# PAIA MANUAL

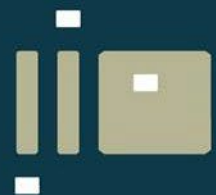


011 064 1665

[info@intergrated.co.za](mailto:info@intergrated.co.za)

[www.intergrated.co.za](http://www.intergrated.co.za)

First Floor, Building B, Stoneridge Office Park,  
8 Greenstone Place, Greenstone, Edenvale, 1609



## 1. PREAMBLE

The Promotion of Access to Information Act, 2000 ("PAIA") came into operation on 9 March 2001. PAIA seeks, among other things, to give effect to the Constitutional right of access to any information held by the State or by any other person where such information is required for the exercise or protection of any right and gives natural and juristic persons the right of access to records held by either a private or public body, subject to certain limitations, in order to enable them to exercise or protect their rights. Where a request is made in terms of PAIA to a private body, that private body must disclose the information if the requester is able to show that the record is required for the exercise or protection of any rights and provided that no grounds of refusal contained in PAIA are applicable. PAIA sets out the requisite procedural issues attached to information requests.

Section 51 of PAIA obliges private bodies to compile a manual to enable a person to obtain access to information held by such body and stipulates the minimum requirements that the manual has to comply with.

This Manual constitutes Intergrated Insurance Administrators (Pty) Limited' PAIA manual. This Manual is compiled in accordance with section 51 of PAIA as amended by the Protection of Personal Information Act, 2013 ("POPIA"), which gives effect to everyone's Constitutional right to privacy and largely commenced on 1 July 2020. POPIA promotes the protection of personal information processed by public and private bodies, including certain conditions so as to establish minimum requirements for the processing of personal information. POPIA amends certain provisions of PAIA, balancing the need for access to information against the need to ensure the protection of personal information by providing for the establishment of an Information Regulator to exercise certain powers and perform certain duties and functions in terms of POPIA and PAIA, providing for the issuing of codes of conduct and providing for the rights of persons regarding unsolicited electronic communications and automated decision making in order to regulate the flow of personal information and to provide for matters concerned therewith.

This PAIA manual also includes information on the submission of objections to the processing of personal information and requests to delete or destroy personal information or records thereof in terms of POPIA.

VERSION	POLICY OWNER	DATE
1	Chief Executive Officer	1 June 2021
2	Information Officer	06 February 2024
3	Information Officer	16 February 2024
4	Information Officer	03 April 2024



## 2. ABOUT INTERGRATED INSURANCE ADMINISTRATORS (PTY) LIMITED

Intergrated Insurance Administrators (Pty) Limited is an Authorised Financial Services Provider with FSP number 43623. Further information can be obtained off the website [www.intergrated.co.za](http://www.intergrated.co.za).

## 3. ORGANOGRAM/STRUCTURE

Chief Executive Officer – Mr P Hancock

Senior Corporate Underwriter – Mrs T Sardinha

Senior Corporate Underwriter – Ms D Street

Corporate Underwriter – Mr J Hancock

Claims and Legal Director – Mr Y Yiannakis

## 4. CONTACT DETAILS

### Information Officer:

Mr Y Yiannakis – (010) 541-1990 – [yorgoy@intergrated.co.za](mailto:yorgoy@intergrated.co.za)

### Physical and Postal address

Building B  
Stoneridge Office Park  
8 Greenstone Place  
Greenstone  
Edenvale  
1609

## 5. INFORMATION REGULATORS GUIDE

An official Guide has been compiled which contains information to assist a person wishing to exercise a right of access to information in terms of PAIA and POPIA. This Guide is made available by the Information Regulator (established in terms of POPIA). Copies of the updated Guide are available from the Information Regulator and the Information Officer free of charge. Any request for public inspection of the Guide at the office of the Information Officer or a request for a copy of the Guide from the Information Officer must substantially correspond with Form 1 of Annexure A to Government Notice No. R.757 dated 27 August 2021 promulgated under the PAIA Regulations. Please refer to Appendix E. Any enquiries regarding the Guide should be directed to:

The Information Regulator:

Tel: 010 023 5200

Email: [enquiries@info regulator.org.za](mailto:enquiries@info regulator.org.za)  
[POPIAComplaints@info regulator.org.za](mailto:POPIAComplaints@info regulator.org.za)



## 6. OBJECTIVES OF THIS MANUAL

The objectives of this Manual are:

- to provide a list of all records held by the legal entity;
- to set out the requirements with regard to who may request information in terms of PAIA as well as the grounds on which a request may be denied;
- to define the manner and form in which a request for information must be submitted; and
- to comply with the additional requirements imposed by POPIA.

## 7. ENTRY POINT FOR REQUESTS

PAIA provides that a person may only make a request for information, if the information is required for the exercise or protection of a legitimate right.

Information will therefore not be furnished unless a person provides sufficient particulars to enable Intergrated Insurance Administrators (Pty) Limited to identify the right that the requester is seeking to protect as well as an explanation as to why the requested information is required for the exercise or protection of that right. The exercise of a data subject's rights is subject to justifiable limitations, including the reasonable protection of privacy, commercial confidentiality and effective, efficient and good governance. PAIA and the request procedure contained in this Manual may not be used for access to a record for criminal or civil proceedings, nor should information be requested after the commencement of such proceedings.

The Information Officer has been delegated with the task of receiving and co-ordinating all requests for access to records in terms of PAIA, in order to ensure proper compliance with PAIA and POPIA.

The Information Officer will facilitate the liaison with the internal legal team on all these requests.

All requests in terms of PAIA and this Manual must be addressed to the Information Officer using the details in paragraph 3 above.

## 8. RECORDS HELD BY INTERGRATED INSURANCE ADMINISTRATORS (PTY) LIMITED

### **Personnel Information:**

These records include employment contracts of all Intergrated Insurance Administrators (Pty) Limited employees, employment policies and remuneration details.

### **Business records of Intergrated Insurance Administrators (Pty) Limited:**

These records include:

- (a) Financial records
- (b) Minutes of board



- (c) Strategic plans and other operational policies
- (d) Annual reports and other statutory reports
- (e) Newsletters, press releases and other publications

## **9. AUTOMATICALLY AVAILABLE INFORMATION**

Information that is obtainable via Intergrated Insurance Administrators (Pty) Limited' website about Intergrated Insurance Administrators (Pty) Limited is automatically available and need not be formally requested in terms of this Manual.

## **10. INFORMATION AVAILABLE IN TERMS OF POPIA**

### **10.1. Categories of personal information collected by Intergrated Insurance Administrators (Pty) Limited**

Intergrated Insurance Administrators (Pty) Limited may collect information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to-

- 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;
- information relating to the education or the medical, financial, criminal or employment history of the person;
- any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
- the biometric information of the person;
- the personal opinions, views or preferences of the person;
- 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;
- the views or opinions of another individual about the person; and
- 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;

### **10.2. The purpose of processing personal information**

In terms of POPIA, personal information must be processed for a specified purpose. The purpose for which personal information is processed by Intergrated Insurance Administrators (Pty) Limited will depend on the nature of the personal information and the particular data subject. This purpose is ordinarily disclosed, explicitly or implicitly, at the time the personal information is collected.

In general, personal information is processed for purposes of dealing with complaints under the CPA, procurement purposes, records management, security, employment and related matters.



### **10.3. A description of the categories of data subjects**

Intergrated Insurance Administrators (Pty) Limited holds information and records on the following categories of data subjects:

- Employees / personnel of Intergrated Insurance Administrators (Pty) Limited;
- Any third party with whom Intergrated Insurance Administrators (Pty) Limited conducts business;
- Contractors of Intergrated Insurance Administrators (Pty) Limited;
- Suppliers of Intergrated Insurance Administrators (Pty) Limited.

(This list of categories of data subjects is non-exhaustive.)

### **10.4. The recipients or categories of recipients to whom the personal information may be supplied**

Depending on the nature of the personal information, Intergrated Insurance Administrators (Pty) Limited may supply information or records to the following categories of recipients:

- Statutory oversight bodies, regulators or judicial commissions of enquiry making a request for personal information;
- Reinsurers, Insurers and co-insurers;
- Banks, outsource providers and our third-party policy administration system provider;
- Any court, administrative or judicial forum, arbitration, statutory commission, or ombudsman making a request for personal information or discovery in terms of the applicable rules;
- South African Revenue Services, or another similar authority;
- Anyone making a successful application for access in terms of PAIA or POPIA; and
- Subject to the provisions of POPIA and other relevant legislation, Intergrated Insurance Administrators (Pty) Limited may share information about a client's creditworthiness with any credit bureau or credit providers industry association or other association for an industry in which Intergrated Insurance Administrators (Pty) Limited operates.

### **10.5. Planned transborder flows of personal information**

If a data subject visits Intergrated Insurance Administrators (Pty) Limited' website from a country other than South Africa, the various communications will necessarily result in the transfer of information across international boundaries.

Intergrated Insurance Administrators (Pty) Limited may need to transfer a data subject's information to service providers in countries outside South Africa, in which case it will fully comply



with applicable data protection legislation.

These countries may not have data-protection laws which are similar to those of South Africa.

#### **10.6. A general description of information security measures to be implemented by Intergrated Insurance Administrators (Pty) Limited**

Intergrated Insurance Administrators (Pty) Limited takes information security measures to ensure the confidentiality, integrity, and availability of personal information in our possession. Intergrated Insurance Administrators (Pty) Limited takes appropriate technical and organisational measures designed to ensure that personal information remains confidential and secure against unauthorised or unlawful processing and against accidental loss, destruction, or damage.

#### **11. INFORMATION AVAILABLE IN TERMS OF OTHER LEGISLATION**

Information is available in terms of certain provisions of the following legislation to the persons or entities specified in such legislation:

- Basic Conditions of Employment Act 75 of 1997
- Companies Act 61 of 1973
- Compensation for Occupational Injuries and Health Diseases Act 130 of 1993
- Employment Equity Act 55 of 1998
- Income Tax Act 58 of 1962
- Labour Relations Act 66 of 1995
- Occupational Health & Safety Act 85 of 1993
- Skills Development Act 97 of 1998
- Skills Development Levies Act 9 of 1999
- Unemployment Contributions Act 4 of 2002
- Unemployment Insurance Act 30 of 1966
- Value Added Tax Act 89 of 1991

#### **12. CATEGORIES OF RECORDS AVAILABLE UPON REQUEST**

Intergrated Insurance Administrators (Pty) Limited maintains records on the categories and subject matters listed below. Please note that recording a category or subject matter in this Manual does not imply that a request for access to such records would be granted. All requests for access will be evaluated on a case-by-case basis in accordance with the provisions of PAIA.

Please note further that many of the records held by Intergrated Insurance Administrators (Pty) Limited are those of third parties, such as clients and employees, and Intergrated Insurance Administrators (Pty) Limited takes the protection of third-party confidential information very seriously. For further information on the grounds of refusal of access to a record please see paragraph 13.5 below. Requests for access to these records will be considered very carefully. Please ensure that requests for such records are carefully motivated.



Category of records	Records
<p>Internal records</p> <p>The records listed pertain to Intergrated Insurance Administrators (Pty) Limited own affairs</p>	<ul style="list-style-type: none"> <li>• Memoranda and Articles of Association</li> <li>• Financial records</li> <li>• Operational records</li> <li>• Intellectual property</li> <li>• Marketing records;</li> <li>• Internal correspondence;</li> <li>• Service records;</li> <li>• Statutory records;</li> <li>• Internal policies and procedures;</li> <li>• Minutes of meetings;</li> </ul>
<p>Personnel records</p> <p>For the purposes of this section, “personnel” means any person who works for or provides services to or on behalf of Intergrated Insurance Administrators (Pty) Limited and receives or is entitled to receive any remuneration and any other person who</p>	<ul style="list-style-type: none"> <li>• Any personal records provided to us by our personnel;</li> <li>• Any records a third party has provided to us about any of their personnel;</li> <li>• Conditions of employment and other personnel-related contractual and quasi legal records;</li> <li>• Employment policies and procedures;</li> <li>• Internal evaluation and disciplinary records; and</li> </ul>





<p>assists in carrying out or conducting the business of Intergrated Insurance Administrators (Pty) Limited. This includes partners, directors, all permanent, temporary and part-time staff as well as consultants and contract workers.</p>	<ul style="list-style-type: none"> <li>• Other internal records and correspondence.</li> </ul>
<p>Client-related records</p>	<ul style="list-style-type: none"> <li>• Contracts with the client and between the client and other persons;</li> </ul>
<p>Other third-party records</p> <p>Records are kept in respect of other parties, including without limitation joint ventures and consortia to which Intergrated Insurance Administrators (Pty) Limited is a party, contractors and sub-contractors, suppliers, service providers, and providers of information regarding general market conditions. In addition, such other parties may possess records which can be said to belong to Intergrated Insurance Administrators (Pty) Limited.</p>	<ul style="list-style-type: none"> <li>• Personnel, client, or Intergrated Insurance Administrators (Pty) Limited records which are held by another party as opposed to being held by Intergrated Insurance Administrators (Pty) Limited; and</li> <li>• Records held by Intergrated Insurance Administrators (Pty) Limited pertaining to other parties, including financial records, correspondence, contractual records, records provided by the other party, and records third parties have provided about the contractors or suppliers.</li> </ul>
<p>Other records</p>	<ul style="list-style-type: none"> <li>• Information relating to Intergrated Insurance Administrators (Pty) Limited; and</li> <li>• Research information belonging to Intergrated Insurance Administrators (Pty) Limited or carried out on behalf of a third party.</li> </ul>

### 13. REQUEST PROCEDURE

#### 13.1. Completion of the prescribed form

Any request for access to a record from a public body in terms of PAIA must substantially correspond with the form included in Appendix A hereto.

A request for access to information which does not comply with the formalities as prescribed by PAIA will be returned to you.

POPIA provides that a data subject may, upon proof of identity, request Intergrated Insurance Administrators (Pty) Limited to confirm, free of charge, all the information it holds about the data subject and may request access to such information, including information about the identity of



third parties who have or have had access to such information.

POPIA also provides that where the data subject is required to pay a fee for services provided to him/her, Intergrated Insurance Administrators (Pty) Limited must provide the data subject with a written estimate of the payable amount before providing the service and may require that the data subject pays a deposit for all or part of the fee.

Grounds for refusal of the data subject's request are set out in PAIA and are discussed below.

POPIA provides that a data subject may object, at any time, to the processing of personal information by Intergrated Insurance Administrators (Pty) Limited, on reasonable grounds relating to his/her particular situation, unless legislation provides for such processing. The data subject must complete the prescribed form attached hereto as Appendix C and submit it to the Information Officer at the postal or physical address or electronic mail address set out above.

A data subject may also request Intergrated Insurance Administrators (Pty) Limited to correct or delete personal information about the data subject in its possession or under its control that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully; or destroy or delete a record of personal information about the data subject that Intergrated Insurance Administrators (Pty) Limited is no longer authorised to retain records in terms of POPIA's retention and restriction of records provisions.

A data subject that wishes to request a correction or deletion of personal information or the destruction or deletion of a record of personal information must submit a request to the Information Officer at the postal or physical address or electronic mail address set out above on the form attached hereto as Appendix D.

### **13.2. Proof of identity**

Proof of identity is required to authenticate your identity and the request. You will, in addition to this prescribed form, be required to submit acceptable proof of identity such as a certified copy of your identity document or other legal forms of identity.

### **13.3. Payment of the prescribed fees**

There are two categories of fees which are payable:

- The request fee: R140



- The access fee: This is calculated by taking into account reproduction costs, search and preparation costs, as well as postal costs. These fees are set out in Appendix B.

Section 54 of PAIA entitles Intergrated Insurance Administrators (Pty) Limited to levy a charge or to request a fee to enable it to recover the cost of processing a request and providing access to records. The fees that may be charged are set out in Regulation 9(2)(c) promulgated under PAIA.

Where a decision to grant a request has been taken, the record will not be disclosed until the necessary fees have been paid in full.

#### **13.4. Timelines for consideration of a request for access**

Requests will be processed within 30 (thirty) days, unless the request contains considerations that are of such a nature that an extension of the time limit is needed.

The Information Officer will inform the requester of the decision, and the fees payable (if applicable) on a form that corresponds substantially with Form 3 of Annexure A to Government Notice No. R.757 dated 27 August 2021 promulgated under the PAIA Regulations. Please refer to Appendix C.

Should an extension be required, you will be notified, together with reasons explaining why the extension is necessary.

The Information Officer will inform the requester of the decision, and the fees payable (if applicable) on a form that corresponds substantially with Form 3 of Annexure A to Government Notice No. R.757 dated 27 August 2021 promulgated under the PAIA Regulations. Please refer to Appendix F.

#### **13.5. Grounds for refusal of access and protection of information**

There are various grounds upon which a request for access to a record may be refused. These grounds include:

- the protection of personal information of a third person (who is a natural person) from unreasonable disclosure;
- the protection of commercial information of a third party (for example: trade secrets; financial, commercial, scientific or technical information that may harm the commercial or financial interests of a third party);
- if disclosure would result in the breach of a duty of confidence owed to a third party;
- if disclosure would jeopardise the safety of an individual or prejudice or impair certain property rights of a third person;
- if the record was produced during legal proceedings, unless that legal privilege has been waived;



- if the record contains trade secrets, financial or sensitive information or any information that would put Intergrated Insurance Administrators at a disadvantage in negotiations or prejudice it in commercial competition; and/or
- if the record contains information about research being carried out or about to be carried out on behalf of a third party or by Intergrated Insurance Administrators (Pty) Limited.

Section 70 PAIA contains an overriding provision. Disclosure of a record is compulsory if it would reveal (i) a substantial contravention of, or failure to comply with the law; or (ii) there is an imminent and serious public safety or environmental risk; and (iii) the public interest in the disclosure of the record in question clearly outweighs the harm contemplated by its disclosure.

If the request for access to information affects a third party, then such third party must first be informed within 21 (twenty one) days of receipt of the request. The third party would then have a further 21 (twenty one) days to make representations and/or submissions regarding the granting of access to the record.

#### **14. NOTICE TO THIRD PARTIES**

When considering a request for access to a record that might be a record contemplated in section 63(1), 64(1), 65 or 69(1), all reasonable steps to inform a third party to whom or which the record relates of the request will be followed.

(2) The Information Officer must inform a third party in terms of subsection (1) –

- (a) as soon as reasonably possible, but in any event within 21 days after that request is received; and
- (b) by the fastest means reasonably possible.

(3) When informing a third party in terms of subsection (1), the Information Officer must –

- (a) state that he or she is considering a request for access to a record that might be a record contemplated in section 63(1), 64(1), 65 or 69(1), as the case may be, and describe the content of the record;
- (b) furnish the name of the requester;
- (c) describe the provisions of section 63(1), 64(1), 65 or 69(1), as the case may be;
- (d) in any case where the Information Officer believes that the provisions of section 70 might apply, describe those provisions, specify which of the circumstances referred to in section 70(a) in the opinion of the Information Officer might apply and state the reasons why he or she is of the opinion that section 70 might apply; and
- (e) state that the third party may, within 21 days after the third party is informed –
  - (i) make written or oral representations to the Information Officer why the request for access should be refused; or



(ii) give written consent for the disclosure of the record to the requester.

(4) If a third party is informed orally of a request for access in terms of subsection (1), the Information Officer must give a written notice stating the matters referred to in subsection (3) to the third party.

(1) A third party that is informed in terms of section 71(1) of a request for access, may, within 21 days after being so informed –

(a) make written or oral representations to the Information Officer concerned why the request should be refused; or

(b) give written consent for the disclosure of the record to the requester concerned.

(2) A third party that obtains knowledge about a request for access other than in terms of section 71(1) may –

(a) make written or oral representations to the Information Officer concerned why the request should be refused; or

(b) give written consent for the disclosure of the record to the requester concerned.

## **15. REMEDIES AVAILABLE TO A REQUESTER ON REFUSAL OF ACCESS**

If the Information Officer decides to grant you access to the particular record, such access must be granted within 30 (thirty) days of being informed of the decision.

There is no internal appeal procedure that may be followed after a request to access information has been refused. The decision made by the Information Officer is final. In the event that you are not satisfied with the outcome of the request, you are entitled to apply to the Information Regulator or a court of competent jurisdiction to take the matter further.

Where a third party is affected by the request for access and the Information Officer has decided to grant you access to the record, the third party has 30 (thirty) days in which to appeal the decision in a court of competent jurisdiction. If no appeal has been lodged by the third party within 30 (thirty) days, you must be granted access to the record.

## **16. AVAILABILITY OF THIS MANUAL**

Copies of this Manual are available for inspection, free of charge, at the offices of Intergrated Insurance Administrators (Pty) Limited



FORM 2: REQUEST FOR ACCESS TO RECORD

REQUEST FOR ACCESS TO RECORD  
[Regulation 7]

Note:

- 16. Proof of identity must be attached by the requester.
- 17. If requests made on behalf of another person, proof of such authorisation, must be attached to this form.

TO: The information officer

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

(Address)

E-mail address: \_\_\_\_\_

Fax number: \_\_\_\_\_

Mark with an "X"

Request is made in my own name       Request is made on behalf of another person.

PERSONAL INFORMATION

Full names:	
Identity number:	
Capacity in which request is made (when made on behalf of another person):	



Postal Address:	
Street Address:	
E-mail Address	
Contact numbers:	
Tel. (B):	
Cellular:	
Facsimile	
Full names of person on whose behalf request is made (if applicable):	
Identity number:	
Postal Address:	
Street Address:	
E-mail Address:	
Contact numbers:	
Tel. (B):	
Cellular:	
Facsimile	
<p><b>PARTICULARS OF RECORD REQUESTED</b></p> <p>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. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)</p>	



Description of record or relevant part of the record:	
Reference number, if available:	
Any further particulars of record:	

<b>TYPE OF RECORD</b> (Mark the applicable box with an "X")	
Record is in written or printed form	
Record comprises virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc)	
Record consists of recorded words or information which can be reproduced in sound	
Record is held on a computer or in an electronic, or machine-readable form	
<b>FORM OF ACCESS</b> (Mark the applicable box with an "X")	
Printed copy of record (including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)	
Written or printed transcription or virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc)	
Transcription of soundtrack (written or printed document)	
Copy of record on flash drive (including virtual images and soundtracks)	



Copy of record on compact disc drive (including virtual images and soundtracks)	
Copy of record saved on cloud storage server	

MANNER OF ACCESS (Mark the applicable box with an "X")	
Personal inspection of record at registered address of public/private body (including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format (including transcriptions)	
E-mail of information (including soundtracks if possible)	
Cloud share/file transfer	
Preferred language: (Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.	
Indicate which right is to be exercised or protected:	
Explain why the record requested is required for the	

exercise or protection of the aforementioned right:	
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FEES	
<p>a) A request fee must be paid before the request will be considered.</p> <p>b) You will be notified of the amount of the access fee to be paid.</p> <p>c) The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.</p> <p>d) If you qualify for exemption of the payment of any fee, please state the reason for exemption.</p>	
Reason:	

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	Facsimile	Electronic communication (Please specify)

Signed at \_\_\_\_\_ on this \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_\_

\_\_\_\_\_  
 Signature of requester / person on whose behalf request is made  
 FOR OFFICIAL USE

Reference number:	
Request received by: (state rank, name and surname of information officer)	
Date received:	
Access fees:	
Deposit (if any):	

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*Signature of information officer*

### **Appendix B - FEES IN RESPECT OF PRIVATE BODIES**

Item	Description	Amount
18.	The request fee payable by every requester	R140.00
19.	Photocopy of A4-size page	R2.00 per page or part thereof.
20.	Printed copy of A4-size page	R2.00 per page or part thereof.
21.	For a copy in a computer-readable form on:	
	(i) Flash drive (to be provided by requestor)	R40.00
	(ii) Compact disc	R40.00
	• If provided by requestor	R60.00
	• If provided to the requestor	



22.	For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on quotation from Service provider.
23.	Copy of visual images	Service to be outsourced. Will depend on quotation from Service provider.
24.	Transcription of an audio record, per A4-size page	R24.00
25.	Copy of an audio record on:  (i) Flash drive (to be provided by requestor)  (ii) Compact disc <ul style="list-style-type: none"><li>• If provided by requestor</li><li>• If provided to the requestor</li></ul>	R40.00  R40.00 R60.00
26.	To search for and prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation. To not exceed a total cost of	R145.00  R435.00
27.	Deposit: If search exceeds 6 hours	One third of amount per request calculated in terms of items 2 to 8.
28.	Postage, e-mail or any other electronic transfer	Actual expense, if any.



**Appendix C - FORM 1 OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN  
TERMS OF SECTION 11(3) OF POPIA**

**REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018**

[Regulation 2]

Note:

1. *Affidavits or other documentary evidence as applicable in support of the objection may be attached.*
2. *If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.*
3. *Complete as is applicable.*

A	DETAILS OF DATA SUBJECT
Name(s) and surname/ registered name of data subject:	
Unique Identifier/ Identity Number	
Residential, postal or business address:	
	Code (    )
Contact number(s):	
Fax number / E-mail address:	



<b>B</b>	<b>DETAILS OF RESPONSIBLE PARTY</b>
Name(s) and surname/ Registered name of responsible party:	
Residential, postal or business address:	
	Code (    )
Contact number(s):	
Fax number/ E-mail address:	
<b>C</b>	<b>REASONS FOR OBJECTION IN TERMS OF SECTION 11(1)(d) to (f) <i>(Please provide detailed reasons for the objection)</i></b>



Signed at ..... this ..... day of .....20.....

.....

*Signature of data subject/designated person*



## Appendix D - 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, 2013 (ACT NO. 4 OF 2013)

#### REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018

[Regulation 3]

Note:

1. Affidavits or other documentary evidence as applicable in support of the request may be attached.
2. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.
3. Complete as is applicable.

Mark the appropriate box with an "x".

#### Request for:

Correction or deletion of the personal information about the data subject which is in possession or under the control of the responsible party.

Destroying or deletion of a record of personal information about the data subject which is in possession or under the control of the responsible party and who is no longer authorised to retain the record of information.

A	DETAILS OF THE DATA SUBJECT
Name(s) and surname / registered name of data subject:	
Unique identifier/ Identity Number:	





Residential, postal or business address:	
	Code (    )
Contact number(s):	
Fax number/E-mail address:	
<b>B</b>	<b>DETAILS OF RESPONSIBLE PARTY</b>
Name(s) and surname / registered name of responsible party:	
Residential, postal or business address:	
	Code (    )
Contact number(s):	
Fax number/ E-mail address:	
<b>C</b>	<b>INFORMATION TO BE CORRECTED/DELETED/ DESTROYED/ DESTROYED</b>



D	<p>REASONS FOR *CORRECTION OR DELETION OF THE PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(a) WHICH IS IN POSSESSION OR UNDER THE CONTROL OF THE RESPONSIBLE PARTY ; and or</p> <p>REASONS FOR *DESTRUCTION OR DELETION OF A RECORD OF PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(b) WHICH THE RESPONSIBLE PARTY IS NO LONGER AUTHORISED TO RETAIN.</p> <p><i>(Please provide detailed reasons for the request)</i></p>

Signed at ..... this ..... day of .....20.....

.....

*Signature of data subject/ designated person*

# Appendix E Form 1 REQUEST FOR A COPY OF THE GUIDE

## REQUEST FOR A COPY OF THE GUIDE

[Regulations 2 and 3]

TO: The Information Regulator

P.O. Box 31533

Braamfontein

2017

Email address:

Tel number: +27 (0) 10 023 5200

OR

The Information Officer

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I,

Full names:				
In my capacity as (mark with "x")	Information Officer		Other	
Name of public/private body (if applicable)				
Postal Address:				
Street Address:				
Email Address:				



Facsimile:			
Contact numbers:	Tel. (B):		Cellular:

hereby request the following copy(ies) of the guide:

Language (make with "X")		No. of copies	Language (make with "X")		No. of copies
	Sepedi			Sesotho	
	Setswana			siSwati	
	Tshivenda			Xitsonga	
	Afrikaans			English	
	isiNdebele			IsiXhosa	
	isiZulu				

Manner of collection (mark with "x")

Postal address	Facsimile	Electronic communication (please specify)

Signed at \_\_\_\_\_ on this \_\_\_\_\_ day of \_\_\_\_\_ 20 \_\_\_\_\_

\_\_\_\_\_  
Signature of requester



OUTCOME OF REQUEST AND OF FEES PAYABLE

[Regulation 8]

Note:

- 29. If your request is granted the-
  - a) amount of the deposit, (if any), is payable before your request is processed; and
  - b) requested record/portion of the record will only be released once proof of full payment is received.
- 30. Please use the reference number hereunder in all future correspondence.

Reference number:

TO: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Your request dated \_\_\_\_\_, refers.

You requested:

<p>Personal inspection of information at the registered address of [•] (including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form) is free of charge. You are required to make an appointment for the inspection of the information and to bring this Form with you. If you then require any form of reproduction of the information, you are liable for the fess prescribed in Error! Reference source not found..</p>	
---	--



OR

You requested:

Printed copies of the information (including copies of an virtual images, transcriptions and information held on computer or in an electronic or machine readable form)	
Written or printed transcription of virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc.)	
Transcription of soundtrack (written or printed document)	
Copy of information on flash drive (including virtual images and soundtracks)	
Copy of information on compact disc drive (including virtual images and soundtracks)	
Copy of record saved on cloud storage server	

To be submitted:

Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format (including transcriptions)	
E-mail of information (including soundtracks if possible)	
Cloud share/file transfer	
Preferred language:  (Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)	

Kindly note that your request has been:

Approved

Denied for the following reasons:



--

Fees payable with regards to your request:

Item	Cost per A4-size page or part thereof/item	Number of pages/items	Total
Photocopy			
Printed copy			
For a copy in a computer-readable form on:			
Flash drive (to be provided by requestor)	R40.00		
Compact disc	R40.00		
If provided by requestor	R60.00		
If provided to the requestor			
For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on quotation from Service provider.		
Copy of visual images			
Transcription of an audio record, per A4-size page	R24.00		
Copy of an audio record on:			
Flash drive (to be provided by requestor)	R40.00		
Compact disc	R40.00		
If provided by requestor	R60.00		
If provided to the requestor			



Postage, e-mail or any other electronic transfer:	Actual costs		
TOTAL			

Deposit payable (if search exceeds six hours):

Yes                      No                     

Hours of search		Amount of deposit  (calculated on one third of total amount per request)	
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The amount must be paid into the following Bank account:

Name of bank: \_\_\_\_\_

Name of account holder: \_\_\_\_\_

Type of account: \_\_\_\_\_

Account number: \_\_\_\_\_

Branch code: \_\_\_\_\_

Reference number: \_\_\_\_\_

Submit proof of payment to: \_\_\_\_\_

Signed at \_\_\_\_\_ on this \_\_\_\_\_ day of \_\_\_\_\_ 20 \_\_\_\_\_

\_\_\_\_\_  
Signature of Information Officer



## **DATA SUBJECT ACCESS REQUEST POLICY AND FORM**

### **1. RECEIPT OF SUBJECT ACCESS REQUESTS**

- 1.1. A Subject Access Request may be received by Intergrated Insurance Administrators (Pty) Limited in any of a number of different forms, including a telephone call, email or letter requesting access to personal information. Subject Access Requests generally tend to originate from current or past employees, job applicants, clients or third parties acting on their behalf (particularly where criminal or civil proceedings are involved).
- 1.2. In the first instance, it may not always be clear that a data subject is making a Subject Access Request. Therefore, it is important to be familiar with this policy to be able to identify a Subject Access Request.
- 1.3. If you receive what you believe to be a Subject Access Request in any form then it is important that you forward a copy of the request to the IO immediately, who will manage the Subject Access Request.
- 1.4. In the case of a telephone call, it is best practice to inform the data subject that his/her/its request for information must be made in writing and cannot be processed otherwise. You should also notify the IO that the phone call has taken place.
- 1.5. Once you have passed the request on to the IO and have received an acknowledgement that it has been received, responsibility for processing the Subject Access Request will be managed by the IO and individuals from the relevant department within Intergrated Insurance Administrators (Pty) Limited (as applicable).

### **2. TIME PERIOD FOR THE RESPONSE**

- 2.1. Intergrated Insurance Administrators (Pty) Limited must respond to a valid Subject Access Request within a reasonable period but always within 30 days.
- 2.2. Where a Subject Access Request is missing any of its required elements, it is essential that a prompt request for the missing part(s) is sent back to the data subject asking for the missing elements.
- 2.3. Once all of the requirements set out above have been met and the request has become a valid Subject Access Request, the stated period for providing a formal response must be complied with.

### **3. WHO IS ENTITLED TO MAKE A SUBJECT ACCESS REQUEST?**

- 3.1. Any data subject is entitled to make a Subject Access Request to Intergrated Insurance Administrators (Pty) Limited. Intergrated Insurance Administrators (Pty) Limited will typically receive Subject Access Requests:



- 3.1.1. from its employees or former employees or job applicants;
  - 3.1.2. from an individual working for a supplier or a supplier;
  - 3.1.3. from a customer who is an individual or a customer; or
  - 3.1.4. from an individual that has used the Intergrated Insurance Administrators (Pty) Limited website.
- 3.2. These individuals and entities have a right to be informed by Intergrated Insurance Administrators (Pty) Limited whether personal information about them is being processed. If personal information is being processed in almost any way by Intergrated Insurance Administrators (Pty) Limited then the data subject is entitled to be given any of the following information:
- 3.2.1. a description of the personal information held; and
  - 3.2.2. an indication of all the third parties or categories of third parties who have or have had of access to the information.

#### Validity of a Subject Access Request

- 3.3. It is necessary to confirm that the Subject Access Request is valid. The validity of a Subject Access Request will depend on the format and content of the Request. A valid Subject Access Request:
- 3.3.1. is in writing to Intergrated Insurance Administrators (Pty) Limited physical or postal address or e-mail address;
  - 3.3.2. provides sufficient information to allow the identification of the data subject in requesting the personal information and the information requested;
  - 3.3.3. indicates the form in which the information should be provided;
  - 3.3.4. specifies an address or email address of the data subject in South Africa; and
  - 3.3.5. includes sufficient identification of the data subject to which the Subject Access Request relates.
4. WHICH INFORMATION THAT IS FOUND IN THE SEARCH MUST BE DISCLOSED AND WHAT CAN INTERGRATED INSURANCE ADMINISTRATORS (PTY) LIMITED REFUSE TO DISCLOSE?
- 4.1. A Subject Access Request only entitles the data subject to access personal information about himself/herself. In general, personal information about a data subject is required to be disclosed if it identifies that data subject.



However, there are important exemptions which may apply. These exemptions apply to very specific information and are complex in its interpretation. The IO will analyse the retrieved personal information and shall apply any relevant exemption.

4.2. Such exemptions are set out in our PAIA manual and may, for example, include information:

4.2.1. That is subject to legal professional privilege; or

4.2.2. That reveals the identity of a third-party data subject.

## 5. OTHER INFORMATION TO BE INCLUDED IN THE RESPONSE

The data subject is also entitled to information about the third parties or categories of third parties who have or have had access to his / her personal information.

Intergrated Insurance Administrators (Pty) Limited

First Floor, Building B,  
Stoneridge Office Park,  
8 Greenstone Place,



Greenstone,  
Edenvale, 1609

011 064 1665  
info@intergrated.co.za

*[insert date]*

Dear Sir or Madam

### **Data Subject access request form**

*[Include your full name, company details and other relevant details to help identify you].*

Please supply the personal information which you hold about me, which I am entitled to receive under the Protection of Personal Information Act, 2013, held in:

*[Give specific details of where to search for the personal data you want, for example:*

- *my personnel file;*
- *emails between 'person A' and 'person B' (from 1 June 2017 to 1 Sept 2017)*
- *my medical records (between 2014 and 2017) held by 'Dr C' at 'hospital D';*
- *the CCTV camera situated at ('location E') on 23 May 2017 between 11am and 5pm; and*
- *financial statements (between 2013 and 2017) held in account number xxxxx.]*

If you need any more information, please let me know as soon as possible.

*[If relevant, state whether you would prefer to receive the data in a particular electronic format or printed out].*


Yours faithfully

*[Signature]*



Version Control:

V4: 03/04/2024

Signatory 1: 

Yorgo Yiannakis

Signatory 2: Paul Hancock  
Paul Hancock (Apr 3, 2024 16:40 GMT+2)

Paul Hancock











# IIA\_PAIAManual - YY v4 03042024

Final Audit Report

2024-04-03

Created:	2024-04-03
By:	Yorgo Yiannakis (yorgoy@intergrated.co.za)
Status:	Signed
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