



King Price Insurance Company Ltd

FSP no. 43862
Reg no. 2009/012496/06
Menlyn Corporate Park, Block A,
Cnr Garsfontein Road & Corobay Avenue,
Waterkloof Glen X11
Pretoria, 0181

PAIA manual

Published in terms of Section 51 of the
Promotion of Access to Information Act No. 2 of 2000

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In a nutshell...

Everyone has the constitutional right to access info to enable them to fully exercise and protect their rights. Because we're all about being open and honest with our clients, brokers, staff, and suppliers, we've created this manual to outline the types of records and personal info we hold, and to explain how you can request this info from us to make more informed decisions.

Introduction

King Price Insurance Company Ltd, FSP no. 43862, reg no. 2009/012496/06, with its registered address at Menlyn Corporate Park, Block A, Cnr Garsfontein and Corobay Avenue, Waterkloof Glen X11, Pretoria, 0181 (King Price/we/us) is a public company registered in terms of the company laws of South Africa which offers insurance products to clients and potential clients.

This manual is published in terms of Section 51 of the Promotion of Access to Information Act No. 2 of 2000 (the PAIA Act/manual) and provides an outline of the type of records and personal info which we hold. The manual also explains how to submit requests for access to these records in terms of the PAIA Act.

In addition to explaining how to access, or object to, personal info held by us, or request correction of the personal info, in terms of Sections 23 and 24 of the Protection of Personal Information Act No. 4 of 2013 (the POPI Act), the manual also explains how to submit requests for access to these records in terms of the PAIA Act.

The objective of the PAIA Act is to give effect to the constitutional right to access info, which is held by a public or private body and which is required for the exercise or protection of any rights. The PAIA Act recognises the right entrenched in Section 32 of South Africa's Constitution (1996) and aims to foster a culture of transparency and accountability in public and private bodies by giving effect to the right of access to info.

Accordingly, requests for access to info held by us will be made in accordance with the prescribed procedures and at the rates provided. The prescribed forms and fee tariffs are dealt with in Chapter 1 of Part 3 of the PAIA Act.

Availability of this PAIA manual

This PAIA manual is published on the King Price website (kingprice.co.za).

Alternatively, a copy can be requested from the info officer or deputy info officers (see contact details below).

Availability of guides to the PAIA and POPI Acts

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

The office of the Information Regulator	
Physical address	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Postal address	PO Box 31533, Braamfontein, Johannesburg, 2017
Phone no.	+27 10 023 5200
Work no.	+27 10 023 5207
Email	enquiries@infoeregulator.org.za
Online	infoeregulator.org.za

Our contact details

Contact details in terms of Section 51 of the PAIA Act

King Price Insurance Company Limited	
FSP no.	43862
Reg no.	2009/012496/06
Physical address	Menlyn Corporate Park, Block A, Cnr Garsfontein and Corobay Avenue, Waterkloof Glen X11, Pretoria, 0181
Postal address	PO Box 284, Menlyn, Pretoria, Gauteng, 0063
Contact no.	+27 12 001 0800
Online	kingprice.co.za

Duly authorised persons

Info officer	
Name	Schalkwyk van der Merwe
Phone no.	+27 12 001 0800
Email	POPI@kingprice.co.za

Deputy info officers	
Name	Quintin Herbst
Phone no.	+27 12 001 0800
Email	POPI@kingprice.co.za
Name	Chris Smith
Phone no.	+27 12 001 0800
Email	POPI@kingprice.co.za
Name	Jaco Labuschagne
Phone no.	+27 12 001 0800
Email	POPI@kingprice.co.za
Name	Marilize Henn
Phone no.	+27 12 001 0800
Email	POPI@kingprice.co.za
Name	Shaun Rosslee
Phone no.	+27 12 001 0800
Email	POPI@kingprice.co.za
Name	Tracy Miller
Phone no.	+27 12 001 0800
Email	POPI@kingprice.co.za

Name	Lukas Kgari
Phone no.	+27 12 001 0800
Email	POPI@kingprice.co.za
Name	Monique Manser
Phone no.	+27 12 001 0800
Email	POPI@kingprice.co.za

Applicable legislation: Records kept by King Price in accordance with any other legislation

The following legislation (among others) which may apply from time to time, applies to (and is observed by) King Price pursuant to undertaking its day-to-day operations:

Item no.	Legislative reference	Act
1	No. 71 of 2008	The Companies Act
2	No. 75 of 1997	The Basic Conditions of Employment Act
3	No. 55 of 1998	The Employment Equity Act
4	No. 58 of 1962	The Income Tax Act
5	No. 66 of 1995	The Labour Relations Act
6	No. 89 of 1991	The Value Added Tax Act
7	No. 37 of 2002	The Financial Advisory and Intermediary Services Act
8	No. 25 of 2002	The Electronic Communications and Transactions Act
9	No. 2 of 2000	The Promotion of Access to Information Act
10	No. 4 of 2013	The Protection of Personal Information Act
11	No. 63 of 2001	The Unemployment Insurance Act
12	No. 68 of 2008	Consumer Protection Act
13	No. 34 of 2005	National Credit Act
14	No 38 of 2001	Financial Intelligence Centre Act
15	No. 53 of 1998	Short-term Insurance Act
16	No. 52 of 1998	Long-term Insurance Act

Company records

Public info

The following records and info are automatically available without a person having to request access in terms of the PAIA Act, on the website kingprice.co.za:

- Confirmation of license in terms of the Insurance Act and Financial Advisory and Intermediary Services Act.
- King Price complaints policy.
- King Price Policy Document (KPPD).
- Conflict of interest policy.
- Whistleblower policy.
- Privacy policy.
- Terms and conditions.
- Immovable property records.
- Audited financial statements.

The list of documents and the classification key provided therewith provides a list of records and classification in respect of its availability:

Departmental records	Subject	Classification no.
Secretarial division	CIPC records	1
	Securities register	2/4
	Constitutional documents	1
	Records of resolutions and decisions	12/13
	Shareholders' agreements	5/6/7/8/12/13
	Health and safety records (employees and contractors)	4/5/8/9
Human resources division	Employee records	4/5
	Employment contracts	4/5
	Personnel guidelines, policies and procedures	3/12
	Employee medical records	4/5
	Employee disability insurance records	4/5
	Employee pension and provident fund records	4/5
	Payroll records	4/5
	Recruitment records	4/5/8/12
Financial division	Tax records (King Price and employees)	12
	Asset register	12
	Supplier records	8/12
	Management accounts	12
	Internal King Price records	12
Legal services and corporate governance division	General contract documentation	6/8/10/12
	Company guidelines, policies and procedures	3/12
	Intellectual property records	3/12
	Employee, client, partner, service provider and supplier info	2/4/5
	Statutory records	2/12
Sales and marketing division	Product/service info and materials	1/3
	Policy and premium details	1/3
	Product sales records	12
	Marketing and future product/plan strategies	12/13
	Client info and database	9/13
	Third party agreements and documents	4/8
	User agreements and history in relation to the use of King Price's products and services	3/4/5/9
	Client info and history	4/5/9
Info technology division	Processing, administrative and development records	3/12/13

Our record classification key

Classification no.	Access	Classification (the PAIA Act section)
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 info of natural persons that belongs to the requester of that info, or personal info of juristic persons represented by the requester of that info (s61)
5	May not be disclosed	Unreasonable disclosure of personal info or of natural person (s63)
6	May not be disclosed	Likely to harm the commercial or financial interests of a third party (s64(1)(a) and (b))
7	May not be disclosed	Likely to harm the company or third party in contract or other negotiations (s64(1)(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 risks (s64(2); s68(2))
12	May not be disclosed	Commercial info of private body (s68)
13	May not be disclosed	Likely to prejudice research and development info of the company or a third party (s69)
14	May not be refused	Disclosure in public interest (s70)

Processing of personal info

Pursuant to promoting responsible info processing practices within its organisation, as well as in its capacity as responsible party contemplated in terms of the provisions of the POPI Act, we take any activity relating to the protection and processing of personal info (as defined in terms of the provisions of Section 1 of the POPI Act) very seriously. To promote the data subjects' constitutional right to privacy, as well as to play its part in promoting the rights protected in terms of the POPI Act, we undertake to, in so far as is required of it, observe the requirements and conditions for the lawful processing of personal info.

Why we process personal info

We may process personal info for a variety of purposes, which may include, but aren't limited to, the following:

- To provide or manage any info, products, or services requested by data subjects.
- To establish a data subject's needs, wants and preferences in relation to the products/services provided by us.
- To identify a data subject's risk profile and decide whether we wish to enter into a contractual relationship with the data subject and, if so, on what terms.
- To help us identify data subjects when they contact us.
- To facilitate the delivery of products/services to clients.
- To administer claims and client premiums.
- To activate policies.
- To allocate unique identifiers to clients for the purpose of securely storing, retaining, and recalling such member's personal info/personal data from time to time.
- To maintain records of data subjects and specifically client records.
- To maintain third party records.
- For recruitment purposes.
- For employment purposes.
- For apprenticeship purposes.
- For general administration purposes.
- For legal/contractual purposes.
- For health and safety purposes.
- To retain the records of brokers.

- To monitor access, secure, and manage any facilities owned or operated by us regardless of location in South Africa.
- To transact with third parties.
- To improve the quality of our products and services.
- To detect and prevent money laundering.
- To analyse the personal info/data collected for research and statistical purposes.
- To enable underwriting management agencies (UMAs) to process claims and discharge any functions specified in a binder agreement.
- To help recover bad debts.
- To transfer personal info/data across the borders of South Africa to other jurisdictions.
- To carry out analysis and client profiling.
- To identify other products and services which might be of interest to our clients and data subjects in general, as well as to inform them of such products/services.
- To obtain and share info about a data subject's creditworthiness and risk profile with any credit bureau or credit provider's industry association or industry body, which includes info pertaining to a data subject's credit history, claims history, financial history, judgements, default history and sharing info for purposes of risk analysis, tracing, and related purposes.

Categories of data subjects and personal info processed by us

The categories of data subjects and personal info processed by us may include, but isn't limited to:

Clients and potential clients	Personal info
	Financial info
	Special personal info
Suppliers, partners, and service providers	Personal info
	Special personal info
Employees	Personal info
	Special personal info

Recipients or categories of recipients with whom personal info is shared

Subject to any relevant terms and conditions of use which may be applicable when a data subject engages with us, we may share the personal info of any data subject we process for any of the purposes outlined in this manual, with the following third parties, whether such third parties qualify as 'responsible parties' in terms of Section 1 of the POPI Act or not:

- Any associated company.
- Any relevant service providers.
- Any consultant or advisor.
- Any relevant regulatory authorities who may govern us in undertaking its operations or business.
- Any approved service provider, contractor, or supplier with whom we have an agreement.
- Authorised financial services providers, such as intermediaries and underwriting managers.
- Any approved business partners who provide products and services to us.
- Any approved service providers or authorised agents who perform services on our behalf.

We process personal info in order to facilitate and enhance the delivery of products and services to our clients, foster a legally compliant workplace environment, as well as safeguard the personal info relating to any data subjects which we hold. We undertake to process any personal info in a manner which promotes the constitutional right to privacy, retains accountability, and data subject participation.

Info security measures to protect personal info

We have, and continue to, implement reasonable, technical, and organisational measures for the protection of personal info processed by us. We, at all times, take reasonable and appropriate security measures to secure the integrity and confidentiality of personal info in our possession in order to guard against:

- The loss of, damage to, or unauthorised destruction of, personal info.
- The unlawful access or processing of personal info.
- The wilful manipulation of personal info.

We'll take steps to ensure that any third party process operators (as defined in terms of Section 1 of the POPI Act) who process personal info on our behalf apply adequate safeguards as outlined above.

Trans-border flows of personal info

We'll only transfer personal info 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 relevant data subject consents to the transfer of their personal info to third parties in any foreign jurisdictions.

We'll take reasonable steps to ensure that any third party process operators are bound by laws, binding corporate rules, or binding agreements that provide an adequate level of protection and uphold the principles for reasonable and lawful processing of personal info as contemplated in terms of the POPI Act.

Personal info received from third parties

When we receive personal info from any third party on behalf of a data subject, we require confirmation that such a third party has written consent from the data subject, that they're aware of the contents of this PAIA manual and our privacy policy, and don't have any objection to our processing their personal info accordingly.

Prescribed request forms and fees

How to gain access to records not automatically disclosed

Info which is automatically available, without having to complete the prescribed form A and pay the requester's fee, will be made available at our offices or in the manner requested, should this be reasonable and possible. The manner of access will include:

- Perusal with copying of material if needed and at the prescribed fee for copies.
- Access to visual, or audio-visual material with a transcription, dubbing, copying or both, if required.

To facilitate the processing of any request by a requester, kindly follow the procedure set forth herein below:

- Use the prescribed Form 2 attached hereto as Annexure A, alternatively found on our website: kingprice.co.za
- Address your request to the info officer.
- Provide sufficient detail to enable us, or any authorised person dealing with a request, to identify:
 - The record/s requested.
 - The requester (and, if an agent is lodging the request on behalf of someone, proof of capacity and authorisation).
 - The South African postal address, email address, or fax number of the requester.
 - The form of access required.
 - If the requester wishes to be informed of the decision in any manner (in addition to being informed in writing) the manner and particulars thereof.
 - The right which the requester is seeking to exercise or protect with an explanation of the reason the record is required in order to exercise or protect the right.
 - The info officer will respond to a request in the format of Form 3, as listed in Annexure B. The said Form is used to report the outcome of a request as well as info regarding the required fees payable, if applicable.

Prescribed fees

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

- A requester is required to pay the prescribed fees before a request will be processed.
- If the preparation of the record requested requires more than the prescribed hours (6), a deposit will be paid (of not more than one third of the access fee which would be payable if the request were granted).
- A requester may lodge an application with a court against the tender/payment of the request fee/deposit.
- Records may be withheld until the fees have been paid.

The detailed fee structure as prescribed in terms of Section 54 of the PAIA Act is attached hereto as Annexure B and is also available on our website (kingprice.co.za) and the Information Regulator's website.

Access to prescribed forms and fees

Prescribed forms can be requested from the info officer or deputy info officers, via email (popi@kingprice.co.za) or at King Price's head office.

Remedies

We don't have an internal appeal procedure regarding the PAIA and POPI Act requests for access to info. As such, the decision made by the duly authorised persons, is final.

In terms of section 77A of the PAIA Act, if a request is denied by the head of a private body, the requester is entitled to lodge a complaint with the Information Regulator within 180 days of the decision, in the prescribed manner and form for appropriate relief. A requester is further entitled in terms of section 78(2)(b) to apply to a court with appropriate jurisdiction within 180 days for appropriate relief.

ANNEXURE A

FORM 2 REQUEST FOR ACCESS TO RECORD [Regulation 7]

NOTE:

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

TO: The Information Officer

Information Officer		Deputy Information Officer	
Address		Address	
Email		Email	
Telephone Number		Telephone Number	

Mark the applicable box with a tick	<input type="checkbox"/> Request is made in my own name <input type="checkbox"/> 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			
		Code	
Street Address			
		Code	
E-mail Address			
Contact Numbers	Tel		
	Facsimile		
	Cellular		
Full names of person on whose behalf request is made (if applicable)			
Identity Number			
Postal Address			
		Code	
Street Address			
		Code	

E-mail Address		
Contact Numbers	Tel	
	Facsimile	
	Cellular	

PARTICULARS OF RECORD REQUESTED

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.)

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

TYPE OF RECORD

(Mark the applicable box with a tick)

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	

FORM OF ACCESS

(Mark the applicable box with a tick)

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 of 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 a tick)

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

FEES

- a) A request fee must be paid before the request will be considered.
- b) You will be notified of the amount of the access fee to be paid.
- 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.
- d) If you qualify for exemption of the payment of any fee, please state the reason for exemption.

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		
		Code
Facsimile		
Electronic Communication (Please specify)		

Signed at _____ 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)	

Signature of Information Officer

Annexure B

FORM 3 OUTCOME OF REQUEST AND OF FEES PAYABLE [Regulation 8]

NOTE:

1. 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.
2. Please use the reference number hereunder in all future correspondence.

Reference Number: _____

TO: _____

Your request dated _____ refers.

1. You requested: (Mark the applicable box with a tick)	
Personal inspection of information 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) 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 will be liable for the fees prescribed in Annexure B.	
OR	
2. You requested: (Mark the applicable box with a tick)	
Printed copies of the information (including copies of any 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)	
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	
3. To be submitted: (Mark the applicable box with a tick)	
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:	

4. 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:			
i. Flash drive			
• To be provided by requestor	R40.00		
ii. Compact disc			
• If provided by requestor	R40.00		
• If provided to the requestor	R60.00		
For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on the quotation of the service provider		
Copy of visual images			
Transcription of an audio record, per A4-size	R24.00		
Copy of an audio record:			
i. Flash drive			
• To be provided by requestor	R40.00		
ii. Compact disc			
• If provided by requestor	R40.00		
• If provided to the requestor	R60.00		
Postage, e-mail or any other electronic transfer:	Actual Costs		
TOTAL:			

5. Deposit payable (if search exceeds six hours):	Yes	No
Hours of search		
Amount of deposit (calculated on one third of total amount per request)		

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 Nr:	
Submit proof of payment to:	

Signed at _____ this _____ day of _____ 20_____.

Signature of Information Officer