



King Price Life Insurance Limited (King Price Life)

FSP no. 47235
Reg no. 1948/029011/06
Menlyn Corporate Park, Block A,
Cnr Garsfontein Road & Corobay Avenue,
Waterkloof Glen X11
Pretoria, 0181

PAIA manual

Promotion of Access to Information Act No. 2 of 2000

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1. Overview

1.1 Revision history

Version	Author	Date	Revision
1	Jothi Devraj	December 2017	Initial drafting
2	Alisha Pala	January 2021	Revision
3	Alisha Pala	March 2021	Incorporating POPIA
4	Christiene Pretorius	May 2021	Revision
5	William Harris	May 2022	Incorporating entity name change and all relevant contact details

1.2 Operational approvals

The following approvals were obtained:

Version	Name	Designation	Signature	Date
5	William Harris	Chief operating officer		
5	Bani Schmidt	Executive marketing, sales and distribution		

2. Introduction and purpose

- 2.1 The purpose of the Promotion of Access to Information Act No. 2 of 2000 (PAIA) is to give effect to the constitutional right of access to any info held by the state, as well as info held by another person that's required for the exercise or protection of any right.
- 2.2 This manual was prepared in accordance with section 51 of PAIA, to address requirements of the Protection of Personal Information Act No. 4 of 2013 (POPIA). In terms of section 51 of the Act, all private bodies are required to compile an info manual (PAIA manual).
- 2.3 The motivation for giving effect of the right to access to info is to foster a culture of transparency and accountability both in public and private bodies and to promote a society in which the people of South Africa have effective access to info to enable them to exercise and protect all their rights more fully.
- 2.4 A guide has been compiled in terms of section 10 of PAIA by the South African Human Rights Commission. It contains info required by a person wishing to exercise any right, contemplated by PAIA.
- 2.5 Queries and guides to the PAIA and POPI Acts can be obtained from or directed to:

The Information Regulator

Physical address JD House
27 Steimens Street
Braamfontein
Johannesburg, 2000

Postal address PO Box 31533
Braamfontein
2017

Phone no. +27 01 023 5200

Email infoereg@justice.gov.za

3. Details of institution

King Price Life Insurance Limited

Physical address Menlyn Corporate Park Block A
175 Corobay Avenue
Waterkloof Glen Ext 11
Pretoria, 0181

Postal address PO Box 284
Menlyn
0063

Phone no. +27 10 590 7700

Email informationofficer@kingprice.co.za

4. Contact details of duly authorised persons

Information officer	Name	William Harris
	Designation	Chief operating officer
	Phone no.	+27 10 590 7700
	Email	william.harris@kingprice.co.za
Deputy information officer	Name	Bani Schmidt
	Designation	Executive marketing, sales and distribution
	Phone no.	+27 10 590 7700
	Email	bani.schmidt@kingprice.co.za
Head of organisation in terms of section 51(1)(a)	Name	Rhett Finch
	Designation	Chief executive officer
	Email	rhett@kingprice.co.za
	Registered physical address	Menlyn Corporate Park, Block A, 175 Corobay Avenue Waterkloof Glen Ext 11, Pretoria, 0181
	Postal address	P.O. Box 284 Menlyn, 0063
	Website/s	stangenlife.co.za kingprice.co.za

- 4.1 The Act prescribes the appointment of an information officer for public bodies where such information officer is responsible to, *inter alia* assess request for access to info.
- 4.2 The head of a private body fulfils such a function in terms of section 51. King Price Life has opted to appoint an information officer to assess such a request for access to info, as well as to oversee its required functions in terms of the Act. The information officer may appoint, where it's deemed necessary, deputy information officers, as allowed in terms of section 17 of the Act as well as section 65 of POPIA.
- 4.3 This is in order to render King Price Life as accessible as reasonably possible for requesters of its records and to ensure fulfilment of its obligations and responsibilities as prescribed in terms of section 55 of POPIA.

5. Documents in the possession of King Price Life

- 5.1 These documents and records are kept in accordance with various legislation that's applicable to King Price Life and may be requested in the prescribed format.
- 5.2 Note that the accessibility of the records may be subject to the grounds of refusal set out in this PAIA manual. Among others, records deemed confidential on the part of a third party, will necessitate permission from the third party concerned, in addition to normal requirements, before King Price Life will consider access.

Admin	Human resources	Operations
<ul style="list-style-type: none"> • Trading licences • Documents of incorporation • Memorandum and articles of association • Minutes of board of directors' meetings • Records relating to the appointment of directors/ auditor/company secretary/ public officer, etc. • Share register and other statutory registers 	<ul style="list-style-type: none"> • Employment contracts • Policies and procedures • Training manuals and records • Trading mandates • Medical aid and pension/ provident fund records • Salary records • Disciplinary code and records • Leave records 	<ul style="list-style-type: none"> • Compliance reports • Complaints procedures and registers • Register of key individuals • Register of representatives • Register of clients • Conflict of interest management policy • Legal agreements and records • Internal and external correspondence
Finance	Client-related records	
<ul style="list-style-type: none"> • Accounting and audit records • Financial statements • Assets inventory • Tax returns and assessments • Accounting officer's report • IRP5 certificates • Income tax records: <ul style="list-style-type: none"> - PAYE and EMP 201 records - Regional service levies - Skills development levies - UIF - Workman's compensation 	<ul style="list-style-type: none"> • Records provided by a client to a third party acting for or on behalf of King Price Life in the financial services industry • Records provided by a third party • Records generated by or within King Price Life in the financial services industry relating to its clients, including transactional records 	

6. Processing of personal info

Pursuant to promoting responsible info processing practices within the organisation, as well as in the capacity of responsible party contemplated in terms of the provisions of POPIA, King Price Life takes any activities relating to the protection and processing of personal info (as defined in terms of the provisions of section 1 of POPIA) very seriously.

To promote the constitutional right to privacy, as well as to play its part in promoting the rights protected in terms of POPIA, King Price Life undertakes, insofar as is required, to observe the requirements and conditions for the lawful processing of personal info.

6.1 The purpose for which King Price Life processes personal info

King Price Life may process personal info for a variety of purposes, which may include, but isn't limited to:

- Providing or managing any info, products and/or services requested by data subjects.
- Establishing a data subject's needs, wants and preferences in relation to the products and/or services provided by King Price Life.
- Identifying a data subject's risk profile and deciding whether King Price Life wishes to enter into a contractual relationship with the data subject and if so, on what terms.
- Helping King Price Life identify data subjects when they contact King Price Life.
- Facilitating the delivery of products and/or services to clients.
- Administering claims and client premiums.
- Activating policies.
- Allocating unique identifiers to clients, for the purpose of securely storing, retaining and recalling such clients' personal info/data from time to time.
- Maintaining records of data subjects and specifically client records.
- Maintaining third party records.
- Recruitment purposes.
- Employment purposes.
- Apprenticeship purposes.
- General admin purposes.
- Legal and/or contractual purposes.
- Health and safety purposes.
- Retaining the records of brokers.

- Monitoring, accessing, securing and managing any facilities owned or operated by King Price Life regardless of location in South Africa.
- Transacting with third parties.
- Improving the quality of King Price Life's products and services.
- Detecting and preventing money laundering and terrorist financing.
- Analysing the personal info/data collected for research and statistical purposes.
- Enabling underwriting management agencies (UMAs) to process claims and discharge any functions specified in a binder agreement.
- Helping recover bad debts.
- Transferring personal info/data across the borders of South Africa to other jurisdiction.
- Carrying out analysis and client profiling.
- Identifying other products and services that might be of interest to our clients and data subjects in general, as well as to inform them of such products and/or services.
- Obtaining and sharing info about a data subject's credit worthiness 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, judgments and default history, and sharing info for purposes of risk analysis, tracing and related purposes.

6.2 Categories of data subjects and personal info processed

The categories of data subjects and personal info processed by King Price Life may include, but isn't limited to the following:

Who	What
Clients/potential clients	<ul style="list-style-type: none"> • Personal info • Financial info • Special personal info
Suppliers/partners/service providers	<ul style="list-style-type: none"> • Personal info • Special personal info
Employees	<ul style="list-style-type: none"> • Personal info • Special personal info

6.3 Recipients or categories of recipients with whom personal info is shared

6.3.1 Subject to any relevant terms and conditions of use that may be applicable when a data subject engages with King Price Life, we may share the personal info of any data subject we process for any of the purposes outlined in section 4.1 above, with the following third parties, whether such third parties qualify as responsible parties in terms of section 1 of POPIA or not:

- Any associated company of King Price Life.
- Any relevant service providers.
- Any consultant or advisor to King Price Life.
- Any relevant regulatory authorities who may govern King Price Life in undertaking its operations or business.
- Any approved service provider, contractor or supplier with whom King Price Life has an agreement.
- UMAs.
- Any approved business partners who provide products and services to King Price Life.
- Any approved service providers or authorised agents who perform services on King Price Life's behalf.

6.3.2 King Price Life processes personal info in order to facilitate and enhance the delivery of products and services to its clients, foster a legally-compliant workplace environment, as well as safeguard the personal info relating to any data subjects which it in fact holds. King Price Life undertakes to process any personal info in a manner that promotes the constitutional right to privacy, and retains accountability and data subject participation.

6.4 Security measures to protect personal info

6.4.1 King Price Life has, and continues to, implement reasonable technical and organisational measures for the protection of personal info it processes. King Price Life at all times takes reasonable and appropriate security measures to secure the integrity and confidentiality of personal info in its possession in order to guard against the:

- Loss of, damage to, or unauthorised destruction of, personal info.
- Unlawful access or processing of personal info.
- Willful manipulation of personal info.

6.4.2 King Price Life will take steps to ensure that any third party process operators (as defined in terms of section 1 of POPIA) who process personal info on its behalf applies adequate safeguards as outlined above.

6.5 Trans-border flows of personal info

King Price Life will 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 POPIA.

6.6 Personal info received from third parties

When King Price Life receives personal info from any third party on behalf of a data subject, it requires 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 the King Price Life privacy policy, and don't have any objection to King Price Life processing their personal info accordingly.

7. Request procedures

Access to records held by King Price Life may be accessed by requesters¹ only once the prerequisite requirements for access have been met. The requester must comply with all the procedural requirements contained in the Act relating to the request for access to a record.

7.1 Personal requester

A personal requester is a requester who's seeking access to a record containing personal info about the requester. King Price Life will voluntarily provide the requested info or give access to any record with regard to the requester's personal info.

King Price Life may require the requester to pay an access fee, and such fee will include fees associated with the search for, preparation of, and reproduction of documents. Such fees won't exceed the maximum applicable published by the Minister of Justice and Constitutional Development in the Government Gazette.

7.2 Other requester

This requester (other than a personal requester) is entitled to request access to info on third parties. However, King Price Life isn't obliged to voluntarily grant access.

King Price Life may require the requester to pay an access fee, and such fee will include fees associated with the search for, preparation of, and reproduction of, documents. Such fees won't exceed the maximum applicable published by the Minister of Justice and Constitutional Development in the Government Gazette.

7.3 Form of request

The requester must comply with all the procedural requirements contained in the Act relating to the request for access to a record being:

- 7.3.1 The requester must use the prescribed form (Annexure A: Form C) to make the request for access to a record. The request should be made to the information officer at the address or email address as stated in section 4 above.
- 7.3.2 The prescribed form must be filled in with sufficient detail to enable the information officer to identify the following:
 - The record or records requested.
 - The identity of the requester.
 - Which form of access is required.
 - The postal address of the requester.
 - The requester must identify the right that's sought to be exercised or protected and provide an explanation of why the requested record is required for the exercise or protection of that right.
- 7.3.3 King Price Life will process the request within 30 days, unless the requester has stated special reasons that satisfy the information officer that circumstances dictate that the above time period not be complied with.

1. A requester is any person making a request for access to the records of, or records held by, King Price Life. The requester must fulfil the prerequisite requirements for access in terms of the Act.

- 7.3.4 The requester will be informed in writing whether access has been granted or denied. If, in addition, the requester requires the reasons for the decision in any other manner, the requester must state the manner and the particulars so required.
- 7.3.5 If a request is made on behalf of another person, the requester must submit proof of the capacity in which the requester is making the request to the satisfaction of the information officer.
- 7.3.6 If an individual is unable to complete the prescribed form because of illiteracy or disability, such a person may make the request orally.

7.4 Decision

- 7.4.1 King Price Life will, within 30 calendar days of receipt of the request, decide whether to grant or decline the request and give notice with reasons (if required) to that effect.
- 7.4.2 The 30-day period with which King Price Life has to decide whether to grant or refuse the request, may be extended for a further period, but not more than 30 days, if the request is for a large amount of info, or the info can't reasonably be obtained within the initial 30-day period. King Price Life will notify the requester in writing if an extension is sought.

7.5 Ground for refusal

- 7.5.1 The main grounds for King Price Life to refuse a request for info may, among others, relate to the:
- 7.5.1.1 Mandatory protection of the privacy of a third party who's a natural person, which would involve the unreasonable disclosure of personal info of that natural person.
- 7.5.1.2 Mandatory protection of the commercial info of a third party, if the record contains:
- Trade secrets of that third party.
 - Financial, commercial, scientific or technical info which, if disclosed, could likely cause harm to the financial or commercial interests of that third party.
 - Info disclosed in confidence by a third party to King Price Life, if the disclosure could put that third party at a disadvantage in negotiations or commercial competition.
 - Mandatory protection of confidential info of third parties if it's protected in terms of any agreement.
- 7.5.1.3 Mandatory protection of the safety of individuals and the protection of property.
- 7.5.1.4 Mandatory protection of records which would be regarded as privileged in legal proceedings.
- 7.5.1.5 The commercial activities of King Price Life, which may include, among others:
- Trade secrets of King Price Life.
 - Financial, commercial, scientific or technical info which, if disclosed, could likely cause harm to the financial or commercial interests of King Price Life.
 - Info, which, if disclosed, could put King Price Life at a disadvantage in negotiations or commercial competition.
 - A computer program that's owned by King Price Life, and that's protected by copyright.
- 7.5.1.6 The research info of King Price Life or a third party, if its disclosure would disclose the identity of King Price Life, the researcher or the subject matter of the research, and would place the research at a serious disadvantage.
- 7.5.2 Requests for info that's clearly frivolous or vexatious, or which involve an unreasonable diversion of resources will be refused.

8. Remedies available when access to info is denied

8.1 Internal remedies

Requests which are refused may be escalated to the information officer by sending an email to lifecompliance@kingprice.co.za

Any decision made by the information officer is final. If the requester isn't satisfied with the answer supplied by the information officer's, he/she should exercise the external remedies at their disposal.

8.2 External remedies

A requester being either a personal requester or any other requester that's dissatisfied with the info officer refusal to disclose info, may, within 30 days of notification of the decision, apply to a court having jurisdiction or contact the Information Regulator for relief.

9. Availability of this manual

This manual is available for inspection by the general public on request, during office hours and free of charge at the offices of King Price Life. It's also published on kingprice.co.za

Annexure A: Form C (prescribed form)

Prescribed form to be completed by a requester

Request for access to records of private body

Section 53(1) of PAIA (Regulation 10)

A. Particulars of private body

The head	
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B. Particulars of person requesting access to a record

Name			
ID no.			
Postal address			
		Code	
Phone no.			
Email			
Capacity in which request is made, when made on behalf of another person			

C. Particulars of person on whose behalf a request is being made

This section must be completed only if a request for info is made on behalf of another person	
Name	
ID no.	

D. Particulars of record

Provide full particulars of the record to which access is requested, including the reference number (if you know it) 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. The requester must sign all additional pages.

Description of the record or relevant part of the record	
Ref no. (if available)	
Any further particulars of the record	

E. Fees

A request for access to a record, other than a record containing personal info about yourself, will only be processed after a request fee has been paid. You'll be notified of the amount of the request fee. The fee payable for access to a record depends on the form in which the access is required, and the reasonable time required to search for and prepare a record.

If you qualify for exemption of the payment of any fee, please state why

F. Form of access to the record

If you're prevented by a disability from reading, viewing or listening to the record in the format of access provided for, state your disability and indicate which format the record is required in.

Disability	
Form in which record is required	

G. 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 additional pages.

Explain why the requested record is required for the exercising or protection of the aforementioned right

H. Notice of decision regarding request for access

You'll be notified in writing whether your request has been approved or denied. If you wish to be informed in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request.

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Signed at _____ this _____ day of _____ 20__.

Requester/person on whose behalf request is made's signature