

# Promotion of Access to Information Act 2 of 2000 (“PAIA”) Manual

for

**King Price Life Insurance Limited**  
“King Price Life”

The background features a large, light gray sunburst at the bottom center. Surrounding it are several concentric circular bands of icons. The innermost band contains icons of a crown, a wheelchair, a heart, a graduation cap, and a rose. The middle band contains icons of a crown, a wheelchair, a heart, a graduation cap, and a rose. The outermost band contains icons of a crown, a wheelchair, a heart, a graduation cap, and a rose. The text "King Price" is written in a large, red, cursive font with a crown above the 'K'. The word "INSURANCE" is written in a smaller, red, bold, sans-serif font below "King Price".

**King Price**<sup>TM</sup>  
**INSURANCE**

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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	Policy review and minor changes
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
6	William Harris	March 2023	General revision
7	William Harris	April 2024	<ul style="list-style-type: none"> <li>Update contact details</li> <li>Include section about processing of personal information</li> </ul>

## 1.2 Operational Approvals

The document has obtained the following approvals:

Version	Name	Designation	Approval Signature	Approval Date
7	William Harris	Chief Operating Officer		24-Jul-24
7	Bani Schmidt	Chief Growth Officer		30-Jul-24

# 2. Introduction and Purpose of the Manual

- 2.1 The purpose of the Promotion of Access to Information Act ("PAIA") is to give effect to the constitutional right of access to any information held by the state, as well as information held by the state, as well as information held by another person that is 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 information manual (PAIA manual).
- 2.3 The motivation for giving effect of the right to access to information 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 information 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 information 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** P.O. Box 31533  
Braamfontein, 2017

**Phone no.** +27 01 023 5200  
**Email** [infoeq@justice.gov.za](mailto:infoeq@justice.gov.za)

### 3. Details of Institution

**King Price Life Insurance Limited (“King Price Life”)**

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

**Postal address** P.O. Box 284  
Menlyn, 0063

**Phone no.** +27 10 590 7700  
**Email** [informationofficer@kingprice.co.za](mailto:informationofficer@kingprice.co.za)

### 4. Contact details of duly authorised persons

<b>Information officer</b>	Name	William Harris
	Designation	Chief Operating Officer
	Phone no.	+27 10 590 7700
	Email	<a href="mailto:william.harris@kingprice.co.za">william.harris@kingprice.co.za</a>
<b>Deputy Information officer</b>	Name	Bani Schmidt
	Designation	Chief Growth Officer
	Phone no.	+27 10 590 7700
	Email	<a href="mailto:bani.schmidt@kingprice.co.za">bani.schmidt@kingprice.co.za</a>
<b>Head of organisation in terms of section 51(1)(a)</b>	Name	Shaun Hammond
	Designation	Chief Executive Officer
	Email	<a href="mailto:shaun.hammond@kingprice.co.za">shaun.hammond@kingprice.co.za</a>
	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	<a href="http://www.stangenlife.co.za">www.stangenlife.co.za</a> <a href="http://www.kingprice.co.za">www.kingprice.co.za</a>

- 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 information.
- 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 is 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 will consider access.

Administration	Customer Related Records	Finance
<ul style="list-style-type: none"> <li>• Trading licenses</li> <li>• Documents of Incorporation</li> </ul>	<ul style="list-style-type: none"> <li>• Records provided by a customer to a third-party acting for or on</li> </ul>	<ul style="list-style-type: none"> <li>• Accounting and Audit Records</li> <li>• Financial Statements</li> </ul>

Administration	Customer Related Records	Finance
<ul style="list-style-type: none"> <li>Memorandum and Articles of Association</li> <li>Minutes of Board of Directors meetings</li> <li>Records relating to the appointment of directors / auditor / company secretary / public officer / etc.</li> <li>Share Register and other statutory registers</li> </ul>	<ul style="list-style-type: none"> <li>behalf of King Price Life in the financial services industry.</li> <li>Records provided by a third party.</li> <li>Records generated by or within King Price Life in the financial services industry relating to its clients, including transactional records</li> </ul>	<ul style="list-style-type: none"> <li>Assets Inventory</li> <li>Tax Returns and Assessments</li> <li>Accounting Officer's Report</li> <li>IRP5 Certificates</li> <li>Income Tax Records:                             <ul style="list-style-type: none"> <li>- PAYE and EMP 201 Records</li> <li>- Regional Service Levies</li> <li>- Skills Development Levies</li> <li>- UIF</li> <li>- Workman's Compensation</li> </ul> </li> </ul>

Human Resources	Operations
<ul style="list-style-type: none"> <li>Employment contracts</li> <li>Policies and Procedures</li> <li>Training Manuals and Records</li> <li>Trading Mandates</li> <li>Medical Aid and Pension/Provident Fund Records</li> <li>Salary Records</li> <li>Disciplinary Code and Records</li> <li>Leave Records</li> </ul>	<ul style="list-style-type: none"> <li>Compliance Reports</li> <li>Complaints Procedures and Registers</li> <li>Register of Key individuals</li> <li>Register of Representatives</li> <li>Register of Clients</li> <li>Conflict of Interest Management Policy</li> <li>Legal Agreements and Records</li> <li>Internal and External Correspondence</li> </ul>

**6. Processing of Personal Information**

6.1 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.

6.2 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.

**6.3 The purpose for which King Price Life processes personal information**

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

- a. Providing or managing any info, products and/or services requested by data subjects.
- b. Establishing a data subject's needs, wants and preferences in relation to the products and/or services provided by King Price Life.
- c. 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.
- d. Helping King Price Life identify data subjects when they contact King Price Life.
- e. Facilitating the delivery of products and/or services to clients.
- f. Administering claims and client premiums.
- g. Activating policies.
- h. Allocating unique identifiers to clients, for the purpose of securely storing, retaining and recalling such clients' personal info/data from time to time.
- i. Maintaining records of data subjects and specifically client records.
- j. Maintaining third party records.
- k. Recruitment purposes.
- l. Employment purposes.
- m. Apprenticeship purposes.
- n. General admin purposes.
- o. Legal and/or contractual purposes.
- p. Health and safety purposes.
- q. Retaining the records of brokers.
- r. Monitoring, accessing, securing and managing any facilities owned or operated by King Price Life regardless of location in South Africa.
- s. Transacting with third parties.
- t. Improving the quality of King Price Life's products and services.
- u. Detecting and preventing money laundering and terrorist financing.
- v. Analysing the personal info/data collected for research and statistical purposes.
- w. Enabling underwriting management agencies (UMAs) to process claims and discharge any functions specified in a binder agreement.

- x. Helping recover bad debts.
- y. Transferring personal info/data across the borders of South Africa to other jurisdiction.
- z. Carrying out analysis and client profiling.
- aa. 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.
- bb. 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.

**6.4 Categories of data subjects and personal information 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 / Visitors	<ul style="list-style-type: none"> <li>• Personal information</li> <li>• Financial information</li> <li>• Special personal information</li> </ul>
Suppliers / Partners / Service providers	<ul style="list-style-type: none"> <li>• Personal information</li> <li>• Special personal information</li> </ul>
Employees / potential employees	<ul style="list-style-type: none"> <li>• Personal information</li> <li>• Special personal information</li> </ul>

**6.5 Recipients or categories of recipients with whom personal information is shared**

- 6.5.1 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:
- a. Any associated company of King Price Life.
  - b. Any relevant service providers.
  - c. Any consultant or advisor to King Price Life.
  - d. Any relevant regulatory authorities who may govern King Price Life in undertaking its operations or business.
  - e. Any approved service provider, contractor or supplier with whom King Price Life has an agreement.
  - f. UMAs.
  - g. Any approved business partners who provide products and services to King Price Life.
  - h. Any approved service providers or authorised agents who perform services on King Price Life’s behalf.

6.5.2 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.

**6.6 Security measures to protect personal information**

- 6.6.1 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.

6.6.2 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.

**6.7 Trans-border flows of personal information**

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.

## 6.8 **Personal information 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 requesters<sup>1</sup> 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 is seeking access to a record containing personal information about the requester. King Price Life will voluntarily provide the requested information or give access to any record with regard to the requester's personal information. 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 will not 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 information on third parties. However, King Price Life is not 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 will not 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 is 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 (thirty) days, unless the requestor has stated special reasons, which would satisfy the Information Officer that circumstances dictate that the above time period not be complied with.

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, he 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 (thirty) 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 (thirty) 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 (thirty) days if the request is for a large amount of information, or the information cannot reasonably be obtained within the initial 30 (thirty) day period. King Price Life will notify the requester in writing if an extension is sought.

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<sup>1</sup> A requester is any person making a request for access to the record of or held by King Price Life

## 7.5 **Grounds for Refusal**

The main grounds for King Price Life to refuse a request for information may amongst others relate to the:

- 7.5.1 Mandatory protection of the privacy of a third party who is a natural person, which would involve the unreasonable disclosure of personal information of that natural person.
- 7.5.2 Mandatory protection of the commercial information of a third party, if the record contains –
  - a. Trade secrets of that third party;
  - b. Financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of that third party;
  - c. Information 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;
  - d. Mandatory protection of confidential information of third parties if it is protected in terms of any agreement;
  - e. Mandatory protection of the safety of individuals and the protection of property; or
  - f. Mandatory protection of records which would be regarded as privileged in legal proceedings.
- 7.5.3 The commercial activities of King Price Life, which may amongst others include –
  - a. Trade secrets of King Price Life;
  - b. Financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of King Price Life;
  - c. Information, which, if disclosed, could put King Price Life at a disadvantage in negotiations or commercial competition;
  - d. A computer program which is owned by King Price Life, and which is protected by copyright; or
  - e. The research information 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.
- 7.5.4 Requests for information that is clearly frivolous or vexatious, or which involve an unreasonable diversion of resources shall be refused.

## 7.6 **Remedies available when access to information is refused by King Price Life**

### 7.6.1 Internal Remedies

Matters which are refused may be escalated to the Information Officer by sending an email to [lifecompliance@kingprice.co.za](mailto:lifecompliance@kingprice.co.za). Any decision made by the Information Officer is final. If the requested is not satisfied with the answer supplied by the Information Officer, he/she should exercise the external remedies at their disposal.

### 7.6.2 External Remedies

A requestor being either a personal requester or any other requester that is dissatisfied with the Information Officer's refusal to disclose information, may within 30 (thirty) days of notification of the decision, apply to a Court for relief.

## 8. **Availability of this Manual**

This manual is available for inspection by the general public upon request, during office hours and free of charge at the offices of King Price Life. It is also published on [www.kingprice.co.za](http://www.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 the Promotion of Access to Information Act, No. 2 of 2000)  
(Regulation 4)

**A. Particulars of Private Body**

The Head:

**B. Particulars of Person requesting Access to the Record**

Full Name and Surname: \_\_\_\_\_  
Identity Number: \_\_\_\_\_  
Postal address: \_\_\_\_\_  
Telephone number: \_\_\_\_\_  
Email address: \_\_\_\_\_  
Capacity in which request is made, when made on behalf of another person \_\_\_\_\_

**C. Particulars of Person on whose behalf Request is made**

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

Full Name and Surname: \_\_\_\_\_  
Identity Number: \_\_\_\_\_

**D. Particulars of Record**

*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 folio and attach it to this form. The requester must sign all the additional folios.*

Description of the Record or relevant part of the record:  
\_\_\_\_\_  
\_\_\_\_\_

Reference number, if available: \_\_\_\_\_  
Any further particulars of the record: \_\_\_\_\_  
\_\_\_\_\_

**E. Fees**

*A request for access to a record, other than a record containing personal information about yourself, will be processed only after a request fee has been paid. You will 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 the reason therefore.*

Reason for exemption of payment of the fee:  
\_\_\_\_\_  
\_\_\_\_\_

**F. Form of Access to the Record**

*If you are prevented by a disability to read, view or listen to the record in the form of access provided for, state your disability and indicate in which form the record is required.*

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 folio and attach it to this form. The requester must sign all the additional folios.*

Indicate which right is to be exercised or protected:

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

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**H. Notice of Decision Regarding Request for Access**

*You will be notified in writing whether your request has been approved/denied. If you wish to be informed thereof 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\_\_\_\_\_.

\_\_\_\_\_  
Signature of Requester / Person on whose behalf Request is made


**Certificate Of Completion**

Envelope Id: F96D1BBC2BD84B10ADC7726DE58FF258	Status: Completed
Subject: PAIA Manual_v7	
Source Envelope:	
Document Pages: 10	Signatures: 2
Certificate Pages: 5	Initials: 0
AutoNav: Enabled	Envelope Originator:
Enveloped Stamping: Enabled	Elserine Gerber
Time Zone: (UTC-08:00) Pacific Time (US & Canada)	, 0181
	elserine.gerber@kingprice.co.za
	IP Address: 41.193.26.130


**Record Tracking**

Status: Original 24-Jul-2024   04:45	Holder: Elserine Gerber elserine.gerber@kingprice.co.za	Location: DocuSign
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**Signer Events**

Signer Events	Signature	Timestamp
PW Harris william.harris@kingprice.co.za King Price Life Security Level: Email, Account Authentication (None)	  Signature Adoption: Uploaded Signature Image Using IP Address: 41.161.3.162	Sent: 24-Jul-2024   04:47 Viewed: 24-Jul-2024   04:48 Signed: 24-Jul-2024   04:49

**Electronic Record and Signature Disclosure:**  
Accepted: 15-Sep-2023 | 00:04  
ID: 53820249-4b2f-4b94-857b-4cedb6afa51d

Bani Schmidt bani.schmidt@kingprice.co.za Growth executive Security Level: Email, Account Authentication (None)	  Signature Adoption: Drawn on Device Using IP Address: 105.184.140.9	Sent: 24-Jul-2024   04:49 Viewed: 30-Jul-2024   01:26 Signed: 30-Jul-2024   01:26
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**Electronic Record and Signature Disclosure:**  
Accepted: 27-Oct-2023 | 04:50  
ID: cb7c1ca3-af0b-49db-a9fd-7d9b87827fb9

**In Person Signer Events**      **Signature**      **Timestamp**

**Editor Delivery Events**      **Status**      **Timestamp**

**Agent Delivery Events**      **Status**      **Timestamp**

**Intermediary Delivery Events**      **Status**      **Timestamp**

**Certified Delivery Events**      **Status**      **Timestamp**

**Carbon Copy Events**      **Status**      **Timestamp**

Elserine Gerber elserine.gerber@kingprice.co.za Executive Assistant King Price Life Insurance Limited Security Level: Email, Account Authentication (None)	<b>COPIED</b>	Sent: 30-Jul-2024   01:26
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**Electronic Record and Signature Disclosure:**  
Not Offered via DocuSign

<b>Witness Events</b>	<b>Signature</b>	<b>Timestamp</b>
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<b>Notary Events</b>	<b>Signature</b>	<b>Timestamp</b>
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<b>Envelope Summary Events</b>	<b>Status</b>	<b>Timestamps</b>
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Envelope Sent	Hashed/Encrypted	24-Jul-2024   04:47
Certified Delivered	Security Checked	30-Jul-2024   01:26
Signing Complete	Security Checked	30-Jul-2024   01:26
Completed	Security Checked	30-Jul-2024   01:26

<b>Payment Events</b>	<b>Status</b>	<b>Timestamps</b>
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<b>Electronic Record and Signature Disclosure</b>
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