



## **PPS INSURANCE PAIA MANUAL**

**as prescribed in terms of the**

**PROMOTION OF ACCESS TO INFORMATION ACT 2 OF 2000 AND  
PROTECTION OF PERSONAL INFORMATION ACT 4 OF 2013**

## 1 Introduction

Section 32 of the Constitution of the Republic of South Africa, No. 108 of 1996 ("the Constitution") provides:

*(1) Everyone has the right of access to –*

*Any information held by the state; and*

*Any information that is held by another person and that is required for the exercise or protection of any rights.*

*(2) National legislation must be enacted to give effect to this right and may provide for reasonable measures to alleviate the administrative and financial burden on the state.*

Section 32 of the Constitution affords everyone the right to access information held by the State or any other person. The Constitution requires that national legislation be enacted to give effect to this right. The Promotion of Access to Information Act, 2 of 2000 (PAIA), gives effect to this constitutional right of access as required in terms of sub-section (2).

PAIA provides that a person must be given access to any record of a private body if the record is required for the exercise of any right<sup>1</sup> and the procedural requirements relating to a request have been complied with. PAIA applies to any recorded information, regardless of form or medium, under the control of the private body, and whether or not the private body created it.

Where a request is made in terms of PAIA, the private or public body to which the request is made is obliged to release the information, except where PAIA expressly provides that the information must not be released. PAIA sets out the requisite procedural issues attached to such request.

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<sup>1</sup> After PPS has satisfied itself that the requester is seeking to exercise or protect a right and not an interest, PPS is then required to ascertain whether the information requested will assist the requester in exercising or protecting the right. The requester is therefore required to establish a nexus, or causal link between the right alleged and the information requested. It does not follow from the mere establishment of the right by the requester that he is automatically entitled to the information requested. The requester must establish that the information sought will assist him in exercising or protecting his right.

PPS Insurance (PPS Inco) has confirmed its status as a private body in terms of the definition in PAIA as well as a responsible party in terms of the definition in the Protection of Personal Information Act, 4 of 2013 (POPIA).

PPS Inco respects and values data privacy rights and ensures that all personal data collected from you is processed in adherence to the general principles of transparency, legitimate purpose, and proportionality.

This Manual should be read with the PPS policies, standards, guidance or procedures, which may be relevant from a privacy perspective, including but not limited to the PPS Group Privacy Policy, PPS Group Internal Privacy Standard, and PPS Group External Privacy Standard, respectively.

## 2 Key definitions

**“Biometrics”** means a technique of personal identification that is based on physical, physiological or behavioural characterisation including blood typing, fingerprint, DNA analysis, retinal scanning and voice recognition;

**“Conditions for Lawful Processing”** means the conditions for the lawful processing of Personal Information as fully set out in chapter 3 of POPIA;

**“Consent”** means any voluntary, specific and informed expression of will in terms of which permission is given for the processing personal information;

**“Constitution”** means the Constitution of the Republic of South Africa, 1996;

**“Customer”** refers to any natural or juristic person that received or receives services from the PPS Inco;

**“Data Subject”** means the natural or juristic person to whom personal information relates, such as an individual member, employee or an entity that provides the PPS Inco with products or services;

**“Head”** means the “head” as defined in section 1 of PAIA and referred to in paragraph 4;

in relation to, a private body means-

- a) in the case of a natural person, that natural person or any person duly authorised by that natural person;

- b) in the case of a partnership, any partner of the partnership or any person duly authorised by the partnership;
- c) in the case of a juristic person:
  - (i) the chief executive officer or equivalent officer of the juristic person or any person duly authorised by that officer; or
  - (ii) the person who is acting as such or any person duly authorised by such acting person;

**“Information Officer”** means the head of a private body, or equivalent officer, or the person who is acting as such. Once appointed the Information Officer must be registered with the South African Information Regulator established under POPIA prior to performing his or her duties which include handling requests for information amongst others. Deputy Information Officers can also be appointed to assist the Information Officer;

**“Deputy Information Officer”** means the person to whom any power or duty conferred or imposed on an Information Officer in terms of POPIA has been delegated to assist the requester in their information request. PAIA does not provide for private bodies to designate a Deputy Information Officer, however it is recommended by the Information Regulator that they do so for efficiency and convenience;

**“Information Regulator”** means the Regulator established in terms of section 39 of POPIA;

**“Manual”** means this PAIA Manual prepared in accordance with section 51 of PAIA and regulation 4(1) (d) of the POPIA Regulations;

**“Person”** means a natural person or a juristic person;

**“Personal Information”** means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to-

- a) information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, wellbeing, disability, religion, conscience, belief, culture, language and birth of the person;
- b) information relating to the education or the medical, financial, criminal or employment history of the person;
- c) any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other assignment to the person;

- d) the biometric information of the person;
- e) the personal opinions, views or preferences of the person;
- f) 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;
- g) the views or opinions of another individual about the person and;
- h) 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;

**“Personal Requester”** means a requester seeking access to a record containing personal information about the requester;

**“Personnel”** refers to any person who works for or provides services to or on behalf of PPS Inco and receives or is entitled to receive any remuneration and any other person who assists in carrying out or conducting the business of PPS Inco. This includes, without limitation, directors, executives, non-executives, all permanent, temporary and part-time staff as well as contract workers;

**“POPIA Regulations”** mean the regulations promulgated in terms of section 112(2) of POPIA;

**“Processing”** means any operation or activity or any set of operations, whether by automatic means or not, concerning personal information, including-

- a) the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
- b) dissemination by means of transmission, distribution or making available in any other form; or products and legal matters relating to those products; or
- c) merging, linking, as well as restriction, degradation, erasure or destruction of information;

**“Responsible Party”** means a public or private body or any other person which, alone or in conjunction with others determines the purpose of and means for processing personal information;

**“Record”** means any recorded information regardless of the form, including, for example, written documents, video materials etc. A record requested from a public or private body would refer to a record that was in that body’s possession regardless of whether that body created the record;

**“Request Fee”** means the cost to be paid for making and processing an access to information request;

**“Requester”** means the natural or juristic person making an access to information request. A requester also refers to the person who is making the information request on behalf of somebody else;

**“Request for Access”** in relation to a private body, means a request for access to a record of a private body in terms of section 50 of PAIA; and

**“Third Party”** refers to any natural or juristic person who is not the requester of the information, nor PPS Inco to whom the information request is made.

Capitalised terms used in this Manual have the meanings ascribed thereto in section 1 of POPIA and section 1 of PAIA as the context specifically requires, unless otherwise defined herein.

### **3 Purpose**

The purpose of the Manual is to provide an outline of the types of records held by PPS Inco, inform you of our data protection and security measures, serve as a guide in exercising rights in terms of POPIA and explain how one may submit requests for access to these records in terms of PAIA. POPIA and PAIA give effect to everyone’s constitutional rights to privacy and access to information held by private sector bodies (e.g. companies) or public bodies (i.e. Government institutions) that is required for the exercise and/or protection of the requester’s rights.

This Manual will also assist you to-

- know the description of the records of PPS Inco which are available in accordance with any other legislation;
- access all the relevant contact details of the Information Officer/s and Deputy Information Officer/s who will assist you with the records you intend to access;
- know if PPS Inco will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- know if PPS Inco has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and

- know whether PPS Insko has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

#### 4 Information Officers Contact Details for PPS Insurance

**i. PPS Insurance Chief Information Officer<sup>2</sup> Name:** Jacques Loubser

**Telephone number:** (011) 644 4300/4491

**E-mail:** privacy@pps.co.za

**ii. PPS Insurance Deputy Information Officer Name:** Kumeshnie Govender

**Telephone number:** (011) 644 4300/4491

**E-mail:** privacy@pps.co.za

**iii. PPS Insurance Deputy Information Officer**

**Name:** Sunthoshan Govender

**E-mail:** privacy@pps.co.za

All the information officers mentioned above, share the following common information:

**Physical address:** 6 Anerley Road, Parktown, 2193

**Postal address:** PO Box 1089, Houghton, 2041

**Fax:** (011) 644 4400

**Website:** <http://www.pps.co.za>

**Member Services Help line:** (011) 644 4300

#### 5 A guide on how to access information via PAIA

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<sup>2</sup> Izak Smit as the Head of the Private Body, has delegated his authority as Chief Information Officer of PPS Insurance to Jacques Loubser.

The Information Regulator has, made available the revised Guide on how to use PAIA (Guide), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.

The aforesaid Guide contains the description of, among others, -

- the objects of PAIA and POPIA;
- the manner and form of a request for access to a record of a private body;
- the assistance available from the Regulator in terms of PAIA and POPIA;
- all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging-
  - an internal appeal;
  - a complaint to the Regulator; and
  - an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;
- the provisions requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- the provisions for the voluntary disclosure of categories of records by a public body and private body, respectively;
- the notices issued regarding fees to be paid in relation to requests for access; and
- the regulations made in terms of section 92.

Should you wish to obtain a copy of the Guide from PPS Insko's Information Officer, you may submit a written request by completing the request for a copy of the Guide Form 1, which is annexed hereto as Annexure A.

Any queries regarding this guide should be directed to:

**The South African Information Regulator:**



Postal Address	P.O Box 31533, Braamfontein, Johannesburg, 2017
Website	<a href="https://inforegulator.org.za/">https://inforegulator.org.za/</a>
Complaints Email Address	POPIAComplaints@inforegulator.org.za PAIAComplaints@inforegulator.org.za
General Enquiries	Enquiries@inforegulator.org.za

## 6 Records available in terms of other legislation

Certain legislation mandates PPS Insko to keep records of personal information.

This would include the following legislation, amongst others, the list is not exhaustive:

No.	ACT	CATERGORY OF RECORD
1	Companies Act 71 of 2008	<ul style="list-style-type: none"> <li>· Memorandum of incorporation.</li> <li>· Annual financial statements.</li> <li>· CIPC company registration document.</li> <li>· Business application form.</li> <li>· Own-organisational title deeds.</li> <li>· Records of directors.</li> <li>· Copies of reports presented at annual general meetings.</li> <li>· Notices and minutes of Board meetings.</li> <li>· Resolutions and their supporting documents.</li> <li>· Minutes of meetings of directors, directors' committees, audit committees, shareholders.</li> <li>• · Record of company secretaries and auditors.Accounting records.</li> </ul>
2	Insurance Act 18 of 2017	Licences
3	Prevention and Combating of Corrupt Activities Act, 12 of 2004	<ul style="list-style-type: none"> <li>· Corrupt or fraudulent employee, client or merchant activities.</li> <li>· Reports on corrupt and fraudulent activities to law enforcement agencies.</li> </ul>

No.	ACT	CATERGORY OF RECORD
4	Financial Intelligence Centre Act 38 of 2001	<ul style="list-style-type: none"> <li>· Identification and verification records.</li> <li>· Client due-diligence records.</li> </ul>
5	Value-Added Tax Act 89 of 1991	<ul style="list-style-type: none"> <li>· Invoices.</li> <li>· Tax invoices.</li> <li>· Credit notes.</li> <li>· Debit notes.</li> <li>· Deposit slips.</li> </ul>
6	Income Tax Act 58 of 1962	<ul style="list-style-type: none"> <li>· IRP5.</li> <li>· IT3a.</li> <li>· Unemployment Insurance Fund (UIF) files.</li> <li>· PAYE information.</li> <li>· SDL information.</li> <li>· VAT records.</li> <li>· Ledgers.</li> <li>· Journals.</li> <li>· Invoices.</li> </ul>
7	The Labour Relations Act 66 of 1995	<ul style="list-style-type: none"> <li>· Disciplinary records, including outcomes.</li> <li>· Labour relations reports.</li> <li>· Arbitration awards.</li> </ul>
8	The Employment Equity 55 of 1998	Employment equity plans and targets.
9	The Basic Conditions of Employment Act 75 of 1997	<ul style="list-style-type: none"> <li>- Employee details.</li> <li>· Labour relations reports.</li> <li>· Information regarding dismissals for dishonesty-related behaviour.</li> <li>· Information on disability, race and religion.</li> <li>· Employee next of kin or emergency contact details.</li> <li>· Conflict-of-interest declarations.</li> <li>· Education information.</li> <li>· Health and safety records.</li> <li>· Pension and provident fund records.</li> <li>· Leave records.</li> <li>· Internal evaluations and performance records.</li> <li>· Disciplinary records.</li> <li>· Training records.</li> <li>· Background checks.</li> </ul>
10	Compensation for Occupational Injuries and diseases Act 130 of 1993	<ul style="list-style-type: none"> <li>· Record of the earnings and other prescribed particulars of all employees.</li> </ul>

No.	ACT	CATERGORY OF RECORD
11	Broad-based Black Economic Empowerment Act, 53 of 2003	<ul style="list-style-type: none"> <li>· BBBEE status.</li> <li>· BBBEE status of suppliers.</li> <li>· Contractor and supplier agreements.</li> <li>· List of suppliers, products, services and distributors.</li> </ul>
12	Financial Advisory and Intermediary Services (FAIS) Act, 37 of 2002	<ul style="list-style-type: none"> <li>· Learning history reports.</li> <li>· Registers of representatives, key individuals, brokers, qualifications completed by intermediaries and competences.</li> <li>· Records evidencing representatives' compliance with section 13(1)–(2) of FAIS.</li> <li>· Continued professional development (CPD) programme and activity records.</li> <li>· Records of financial and system procedures.</li> <li>· Records evidencing supervision actions undertaken.</li> <li>· Records evidencing the deployment of adequate technological resources to maintain client records and data integrity.</li> <li>· Records relating to conclusions regarding compliance with independent requirements, and the substance of relevant discussions that support those conclusions.</li> <li>· Records relating to giving advice, call recordings and product agreements.</li> <li>· Records relating to debarments of FAIS representatives and key individuals.</li> <li>· Records relating to business continuity plans.</li> <li>· Signed supervision agreements.</li> <li>· Representative letters of authority.</li> <li>· Key-individual authorisation letters.</li> <li>· FSP licence and addendum with conditions.</li> <li>· Complaints management (contact details of the compliance officer).</li> </ul>
13	Protection of Personal Information Act, 4 of 2013	<ul style="list-style-type: none"> <li>· POPIA operating contract.</li> <li>· Data transfer agreement.</li> <li>· POPIA Disclaimer.</li> </ul>
14	Policyholder Protection Rules	<ul style="list-style-type: none"> <li>· Policies</li> <li>· Claims</li> <li>· Complaints</li> </ul>

## 7 Access to records held by private body in question

### I. Records/information which are automatically available to a person without the requirement of a formal request or the person having to request access in terms of the PAIA Act:

- Address and telephone details of company head office and provincial offices;
- Web site and company e-mail address;
- Management team names and company details (e-mail address, tel.& fax no);
- Directors' names;
- Total of staff members (numbers);
- Contents in annual reports;
- Contents in company magazine;
- Contents in product brochures;
- Names of suppliers of services (i.e. cleaning services, gardening etc.).

## II. List of records per subject:

Information in the categories below is not available without a formal request as per the instructions of the request procedure and may be declined by PPS Insko to protect PPS Insko's own, commercial or research information.

Category	Description of record kept
Membership records	<ul style="list-style-type: none"> <li>○ Policyholder/member details:</li> <li>○ personal details (indicative details);</li> <li>○ medical history (medical history answers);</li> <li>○ financial details (banking details and income);</li> <li>○ beneficiary details (names of beneficiaries);</li> <li>○ qualification details (qualifications and institutions);</li> <li>○ insurance adviser details (name and contact details); and</li> <li>○ signed declaration by policyholder/member.</li> </ul>
Medical records	<ul style="list-style-type: none"> <li>○ medical records obtained through medical examinations as part of standard medical requirements;</li> <li>○ medical records of previous examinations held by doctor/dentist; and</li> <li>○ medical records submitted by applicant.</li> </ul>

Category	Description of record kept	
Financial records	<ul style="list-style-type: none"> <li>○ Financial statements of company;</li> <li>○ Financial documents compiled by Auditors;</li> <li>○ Financial documents compiled by Investment Advisors;</li> <li>○ Financial documents compiled by Actuaries;</li> <li>○ Internal budget documents;</li> <li>○ Cheque and banking facilities, bank account numbers;</li> <li>○ Historical documents on financial status of company; and</li> <li>○ Tax details.</li> </ul>	
Property records	<ul style="list-style-type: none"> <li>○ Names of properties owned by company;</li> <li>○ Property details: purchase/lease/selling information;</li> <li>○ Legal documents as part of property information.</li> </ul>	
Investment records	<ul style="list-style-type: none"> <li>○ Details of investments of company;</li> <li>○ Details of investment in property;</li> <li>○ Investment portfolios and formulas;</li> <li>○ Investment performance;</li> <li>○ Documents compiled by advisers; and</li> <li>○ Any other related documents.</li> </ul>	
Company records	<ul style="list-style-type: none"> <li>○ Registration details;</li> <li>○ Company license information and details;</li> <li>○ Policies and procedures;</li> <li>○ Underwriting;</li> <li>○ Sales;</li> <li>○ Products;</li> <li>○ Strategy;</li> </ul>	<ul style="list-style-type: none"> <li>○ Business directives;</li> <li>○ Alliance partners contracts and details;</li> <li>○ Suppliers' contracts;</li> <li>○ Personnel/staff details;</li> <li>○ Pension/provident fund details; and</li> <li>○ Medical aid fund details.</li> </ul>

Category	Description of record kept
Legal records	<ul style="list-style-type: none"> <li>○ Documents compiled by Attorneys;</li> <li>○ Records of legal cases;</li> <li>○ Appeal records; and</li> <li>○ Cancellation/termination of membership legal records.</li> </ul>
Other records	<p>This includes four broad subjects:</p> <ul style="list-style-type: none"> <li>○ Personnel records;</li> <li>○ Customer-related records;</li> <li>○ Private body records;</li> <li>○ Records in the possession of or pertaining to other parties; and</li> <li>○ Systems and computing configuration data</li> </ul>

### Other records

Category	Description of record kept
Personnel records	<ul style="list-style-type: none"> <li>○ Any personal records provided to PPS Insko by their personnel or/and former personnel;</li> <li>○ Any records a third party has provided to PPS Insko about any of their personnel;</li> <li>○ Conditions of employment and other personnel-related contractual and quasi-legal records;</li> <li>○ Internal evaluation records; and</li> <li>○ Other internal records and correspondence.</li> </ul>
Customer-related records	<ul style="list-style-type: none"> <li>○ Any records a customer has provided to a third party acting for or on behalf of PPS Insko;</li> <li>○ Any records a third party has provided to PPS Insko; and</li> <li>○ Records generated by or within PPS Insko pertaining to the customer, including transactional records.</li> </ul>

Category	Description of record kept	
Private body records	<ul style="list-style-type: none"> <li>○ Financial records;</li> <li>○ Operational records;</li> <li>○ Databases;</li> <li>○ Information technology;</li> <li>○ Marketing records;</li> <li>○ Internal correspondence;</li> </ul>	<ul style="list-style-type: none"> <li>○ Statutory records;</li> <li>○ Internal policies and procedures;</li> <li>○ Treasury-related records;</li> <li>○ Securities and equities;</li> <li>○ Records held by officials of the private body. and</li> <li>○ Product records.</li> </ul>
Records in the possession of or pertaining to other parties (e.g. suppliers, subsidiary /holding/sister companies/joint ventures/service providers)	<ul style="list-style-type: none"> <li>○ Personnel, customer or private body records which are held by another party as opposed to being held by PPS Insko; and</li> <li>○ Records held by PPS Insko pertaining to other parties, including without limitation financial records, correspondence, contractual records, records provided by the other party, and records third parties have provided about the contractors / suppliers.</li> </ul>	

The following details are available without a formal request, but must be accompanied by a formal consent form from the policyholder if the requester of the information (third party) is not the official adviser/marketer of the policyholder as per the PPS Insko records:

- Policyholder details;
- Address details;
- Telephone details;
- Products categories and premiums paid;
- Medical Aid scheme option.

**Granting/declining of information:**

Within 30 days (normal calendar days) after receipt of a request, PPS Insko will advise the requester whether the request has been granted or declined and the fees payable, on a Form 3 annexed hereto as Annexure C. If declined, reasons will be given. Furthermore, if the record pertains to a third party,

PAIA requires PPS Insko to notify the third party of the request and be given an opportunity to either consent to the release or make representations in favour of or declining the request. A dissatisfied requester or third party is entitled to an appeal process by way of application to court.

## **8 Compulsory declining of requests for information**

A request for a record must be declined to protect:

- The privacy of a third party;
- Commercial information of a third party;
- Confidential information of a third party;
- The safety of individuals and the protection of property;
- Records privileged from production in legal proceedings;
- Research information of a third party.

Discretionary declining of requests:

A request may be refused to protect the commercial or research information of PPS Insko.

## **9 Request procedure**

### **Details of submitting a formal request:**

1. Submit Request Form 2 (Annexure B) for the attention of the appropriate Information Officer to the address, fax number or electronic mail address provided in this Manual.
2. Ensure that the right you wish to protect, or exercise is fully described in the Request Form.
3. If a request is made on behalf of another person, the requester must then submit proof of the capacity in which the requester is making the request.
4. The Information Officer will assess the request and advise the requestor within 30 calendar days of the decision made, on Form 3 (Annexure C).
5. The information, if granted, will be supplied to the requester in a format applicable to the request. If declined the requestor will be notified in writing and will be provided with the reasons for the decision.
6. If you have any questions about our use of your Personal Information you can contact the appropriate Information Officer of PPS Insko in accordance with the contact details provided in this Manual.



## **10 Processing of Personal Information**

Refer to the PPS Group External Privacy Standard read with the PPS Group Internal Privacy Standard on how PPS processes personal information.

## **11 Security measures used to ensure safety of Personal Information**

PPS Group subscribes to the concept of cyber security defence in depth. This means that several layers of security technology are employed to protect personal information. Key technologies protect access to systems inside the organisation and from external access via the Internet. The latest threat analytics and response tools are used to continuously monitor and respond to events that may occur on the PPS Group network. Critical data is encrypted and regularly backed-up to protect exposure and maintain business continuity.

## **12 Transborder flows of personal information**

Personal Information is stored on Clouds which are hosted in Belgium and Germany. All personal information that is collected by PPS from its members is kept on these clouds.

In order to safeguard the personal information that is on the Clouds, including:

- a) The restriction to access the cloud platform.
- b) There is a 2- Factor authentication.
- c) Functional environments are segregated and are contained within their own security boundaries with selective access.
- d) All clouds are hardened according to secure standards and are scanned periodically for vulnerabilities.
- e) Cloud security tools from Microsoft and Google (i.e. native security tools) are configured to detect anomalous behaviour on cloud.
- f) General security tools such as Endpoint Detection and Response (EDR), network analysis and threat analysis tools are implemented as well.
- g) Access events and all security events are monitored by a 24/7 security operations centre.
- h) Alerts from security tools are monitored through a 24/7 Managed Detection and Response service.

There are no other circumstances where PPS has transborder flow of personal information.

### **13. Categories of data subjects**

PPS considers the following different categories of data subjects in its processing of personal information:

a) Employees

PPS collect and store information about its employees, such as ID numbers and bank account details, in order to manage the employment relationship;

b) Candidates

PPS processes certain information about or on potential candidates, such as their employment history and credit score, in order to assess suitability for employment;

c) Prospects

PPS Sales teams collect and store information about leads and prospects;

d) Policyholders/membersc

PPS record information on its policyholders/ clients, such as contact details and roles, so that they can communicate and provide services to them;

e) Suppliers and Brokers

PPS retains information about its suppliers and brokers, such as bank details, in order to manage the supplier relationship;

### **14. Recipients or categories of recipients to whom personal information may be supplied**

a) Operators

PPS may transfer or supply operators with personal information to enable the operator to provide a service. In this instance, PPS will in terms of a written contract between it and the operator, ensure that the operator which processes personal information for the PPS establishes and maintains the security measures on integrity and confidentiality of personal information.

## 15. Fees

A requester who seeks access to a record containing personal information about that requester is not required to pay the request fee. Every other requester, who is not a personal requester, must pay the required request fee:

- PPS Information Officer must notify the requester (other than a personal requester) by notice, requiring the requester to pay the prescribed fee (if any) before further processing the request [section 54(1)].
- The fees (if any) that the requester must pay to PPS will depend on the format of the information being requested (The requester may lodge an internal appeal or an application to the Court against the tender or payment of the request fee [section 54(3)(b)]. For a complete fee schedule please visit the Information Regulator at [www.inforegulator.org.za](http://www.inforegulator.org.za) .
- After the Information Officer has decided on the request, the requester must be notified in the required Form 3 (Annexure C).

If the request is granted then a further access fee must be paid for the search, reproduction, preparation and for any time that has exceeded the prescribed hours to search and prepare the record for disclosure [section 54(6)].

## 16. Availability of the Manual

- A copy of the Manual is available-
  - on <http://www.pps.co.za>;
  - to any person upon request and upon the payment of a reasonable prescribed fee; and
  - to the Information Regulator upon request.
- A fee for a copy of the Manual, as contemplated in annexure B of the Regulations issued under PAIA, 2021, shall be payable per each A4-size photocopy made.

### **Manual Administration**

#### **Target Audience:**

All persons requiring information from PPS Insco

#### **Approved and Issued by:**

Group Executive Committee

**Person responsible for the Manual administration:**

Mr L. Du Plessis, Group Executive: Legal and Compliance

+27 11 644 4491

**Next update required:**

August 2026

**ANEXURE A.**

**FORM 1**

**REQUEST FOR A COPY OF THE GUIDE**

[Regulations 3]

**TO:** 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:			
E-mail Address:			
Facsimile:			
Contact numbers:	Tel.(B):		Cellular::

Hereby request the following copy (ies) of the Guide:

Language (mark with "X")	No of copies	Language (mark with "X")	No of copies
Sepedi		Sesotho	
Setswana		siSwati	
Tshivenda		Xitsonga	
Afrikaans		English	
isiNdebele		isiXhosa	
isiZulu			

Manner of collection (mark with "x"):

Personal collection	Postal address	Facsimile	Electronic communication (Please specify)

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

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

## ANENXURE B

### FORM 2

### REQUEST FOR ACCESS TO RECORD

[Regulation 7]

**NOTE:**

1. Proof of identity must be attached by the requester.
2. 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 <i>(when made on behalf of another person)</i>				
Postal Address				
Street Address				
E-mail Address				
Contact Numbers	Tel. (B):		Facsimile:	
	Cellular:			
Full names of person on whose behalf request is made <i>(if applicable):</i>				
Identity Number				
Postal Address				

Street Address				
E-mail Address				
Contact Numbers	Tel. (B)		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:	
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Reference number, if available	
Any further particulars of record	
<b>TYPE OF RECORD</b> <i>(Mark the applicable box with an "X")</i>	
Record is in written or printed form	
Record comprises virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
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> <i>(Mark the applicable box with an "X")</i>	
Printed copy of record <i>(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)</i>	
Written or printed transcription of virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
Transcription of soundtrack <i>(written or printed document)</i>	
Copy of record on flash drive <i>(including virtual images and soundtracks)</i>	
Copy of record on compact disc drive <i>(including virtual images and soundtracks)</i>	
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 <i>(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)</i>	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format <i>(including transcriptions)</i>	
E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language <i>(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)</i>	

**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	Facsimile	Electronic communication ( <i>Please specify</i> )

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

\_\_\_\_\_  
**Signature of Requester / person on whose behalf request is made**

-----  
**FOR OFFICIAL USE**

<i>Reference number:</i>	
<i>Request received by: (State Rank, Name And Surname of Information Officer)</i>	
<i>Date received:</i>	
<i>Access fees:</i>	
<i>Deposit (if any):</i>	

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

**ANNEXURE C 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.

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

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

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

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

**1. You requested:**

Personal inspection of information at registered address of public/private body ( <i>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</i> ) 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.	
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**OR**

**2. You requested:**

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

**3. 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 ( <i>including transcriptions</i> )	
E-mail of information ( <i>including soundtracks if possible</i> )	
Cloud share/file transfer	
Preferred language: ( <i>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</i> )	

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		
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 (ii) Compact disc • If provided by requestor • If provided to the requestor	R40.00  R40.00 R60.00		
Postage, e-mail or any other electronic transfer:	Actual costs		
<b>TOTAL:</b>			

**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 a bank which is nominated by PPS.  
To get the banking details contact PPS at [privacy@pps.co.za](mailto:privacy@pps.co.za).

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

\_\_\_\_\_  
Information officer

