

Policy

PAIA Manual

Innovation Group

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (as amended)

1. LIST OF ACRONYMS AND ABBREVIATIONS

- 1.1. "CEO" Chief Executive Officer
- 1.2. "DIO" Deputy Information Officer;
- 1.3. "IO" Information Officer;
- 1.4. "Minister" Minister of Justice and Correctional Services;
- 1.5. "PAIA" Promotion of Access to Information Act No. 2 of 2000 (as amended);
- 1.6. "POPIA" Protection of Personal Information Act No.4 of 2013;
- 1.7. "Regulator" Information Regulator; and
- 1.8. "Republic" Republic of South Africa

2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to

- 2.1. check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 2.2. have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- 2.3. know the description of the records of the body which are available in accordance with any other legislation;
- 2.4. access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;
- 2.5. know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 2.6. know if the body 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;
- 2.7. know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.8. know the recipients or categories of recipients to whom the personal information may be supplied;
- 2.9. know if the body 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 the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF INNOVATION GROUP

- 3.1. Managing Director
Name: Ross Simmonds
Tel: +27834595383
Email: Ross.Simmonds@innovation.group
- 3.2. Deputy Information Officer
Name: Neels Conradie
Tel: Work +27117905310
Email: Neels.Conradie@innovation.group
- 3.3. Deputy Information Officer
Name: Sibongile Xaba
Tel: Work +27117905231
Email: Sibongile.Xaba@innovation.group

- 3.4. Access to information general contacts
Email: information.officer@innovation.group

- 3.5. National or Head Office
Postal Address: 155 West Street, Sandown, Sandton
Physical Address: 155 West Street, Sandown, Sandton
Telephone: +27117905000
Email: customercare@innovation.group
Website: <https://www.innovation.group>

4. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

- 4.1. The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and 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.

- 4.2. The Guide is available in each of the official languages and in braille.

- 4.3. The aforesaid Guide contains the description of-
 - 4.3.1. the objects of PAIA and POPIA;
 - 4.3.2. the postal and street address, phone and fax number and, if available, electronic mail address of
 - 4.3.2.1. the Information Officer of every public body, and
 - 4.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA;
 - 4.3.3. the manner and form of a request for
 - 4.3.3.1. access to a record of a public body contemplated in section 11; and
 - 4.3.3.2. access to a record of a private body contemplated in section 50;
 - 4.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;
 - 4.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;
 - 4.3.6. 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
 - 4.3.6.1. an internal appeal;
 - 4.3.6.2. a complaint to the Regulator; and
 - 4.3.6.3. 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;
 - 4.3.7. the provisions of sections 14 and 51 requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
 - 4.3.8. the provisions of sections 15 and 52 providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
 - 4.3.9. the notices issued in terms of sections 22 and 54 regarding fees to be paid in relation to requests for access; and
 - 4.3.10. the regulations made in terms of section 92.

4.4. Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.

4.5. The Guide can also be obtained-

4.5.1 upon request to the Information Officer;

4.5.2 from the website of the Regulator (<https://www.justice.gov.za/inforeg/>).

4.6 A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours-

4.6.1 English, and isiZulu

5. CATEGORIES OF RECORDS OF INNOVATION GROUP WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

NB: Please specify all the records which are created and available in accordance with any of the South African legislation. Below is an example of the table that can be used in describing the records and applicable legislation.

Category of Records	Document Type	Available on Website	Available upon request
Policies and Procedures	Innovation Group approved	x	
	repairer lists	x	
	Complaints Management Framework	x	
	Complaints Policy	x	
	Conflict of Interest	x	
	Anti Money Laundering Policy	x	
	PAIA (Promotion of Access to Information) Form 2	x	
	PAIA (Promotion of Access to Information) Manual	x	
	Newsletters	Informational Documents	x
Group and divisional profiles	General Information	x	
Company Structure	General Information	x	

6. DESCRIPTION OF THE RECORDS OF INNOVATION GROUP WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Category of Records	Applicable Legislation
PAIA Manual	Promotion of Access to Information Act 2 of 2000
Memorandum Of Incorporation Shareholder Records Secretarial Records Banking Records Directors' Details	Companies Act 71 of 2008
The following records about customers: Name and Surname, Contact Number, Identity Number, email address, Address, Banking Details,	Short Term Insurance Act 53 of 1998
Employee name and surname, contact number, identity number, passport number, phone number, age, address, banking details, Family Records (i.e. next of kin name and surname, contact number) Medical Details Professional	Employment Equity Act 55 of 1998 Basic Conditions of Employment Act 75 of 1997 Labour Relations Act 66 of 1995 Income Tax Act, 58 of 1962

History (Occupation, Qualifications) Demographic details (Age, Income, Gender, Location) Financial Records (Salary, Banking Details, SARS related information) Behavioural data (Criminal checks, performance, disciplinary)	
Identity of prospective or existing Supplier/Entity and occupation Ownership and Control Structure of the Supplier/Entity Information regarding the business relationship (nature and purpose of business) The source of income/ funds/wealth that the client expects to use during the business relationship The anticipated level and nature of the activity that is to be undertaken during the business relationship The nature and extent of the activity/business activity that the client may be involved in	Financial Intelligence Centre Act 38 of 2001 Prevention of Organised Crime Act, 121 of 1998
Clients' identification details and document Demographic records Demographic details (Age, Income, Gender, Location) Financial records, Records of premature cancellations of transactions or financial products by clients Records of complaints received together with an indication whether or not any such complaints have been resolved Full and proper accounting records, Records of all funds received and payments made and of all assets, liabilities and financial transactions	Financial Advisory and Intermediary Services Act 37 of 2002

7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY INNOVATION GROUP

Subject on which the body holds records	Categories of Records
Strategic Documents, Plans, Proposals	Annual Reports Strategic Plan
Human Resources	HR Policies and Procedures Advertised posts Employee records
Policyholder Information	Policyholder Documents Documents provided to a 3rd party acting on behalf of Innovation Group

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

Innovation Group processes personal information for the purposes of fulfilling contractual obligations with data subjects, improving performance and product offerings. The type of information collected and processed will depend on the purpose for which it is collected and used. We will only collect information that we need for that purpose and additionally, Innovation Group may supplement the information collected or received from business partners and service providers, to offer consistent and personalised experience and services. We process personal information provided to us by our strategic partners (Clients or Insurers) or collect personal information directly from data subjects for purposes of offering products or performing various contractual obligations such as:

- performing risk assessments on clients
- Processing of claims
- Process sales on products
- Conducting Research

Innovation Group may disclose your information:

- Where we have a right to disclose in terms of law or industry codes
- Where we believe it is necessary to protect our rights

8.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

Innovation Group processes categories of personal information for the following data subjects

Categories of Data Subjects	Personal Information that may be processed
Customers / Clients	name, address, email address, identity numbers, vehicle information and bank details
Service Providers	names, registration number, vat numbers, address, trade secrets and bank details
Employees	address, qualifications, gender and race, identify number, physical address, health information, disability information, employee benefit information, bank details, tax number, letter of appointment, vehicle registration information, performance records, payslips, training records, CV, records of qualifications, psychometric assessment results, credit check results, criminal record check results, CCTV footage, next of kin information, beneficiary information, sexual health, religious or philosophical beliefs
Suppliers	Name, Registration Number, Address, Shareholder/Ownership details

8.3 The recipients or categories of recipients to whom the personal information may be supplied

Innovation Group may provide information or give access to any record with regard to the requester's personal information without the requester having to pay an access fee, but the prescribed fees for reproduction of the information requested will be charged. In relation to any other request, they are entitled to request access to information relating to a third party/ parties; however, Innovation Group is not obliged to voluntarily grant access. Such requester must fulfil the prerequisite requirements for access in terms of the Act, including payment of the relevant fees. Subject to the nature of a data requested Innovation Group may supply personal information to the following recipients:

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Identity number and names, for criminal checks	South African Police Services and companies that conduct criminal checks
Qualifications, for qualification verifications	South African Qualifications Authority (SAQA)
Credit and payment history	Companies that conduct credit and criminal checks on behalf of Innovation Group

8.4 Planned transborder flows of personal information

Innovation group may transfer personal information to a third party who is in a foreign country to administer certain services. Should Innovation Group do so, it shall be under in accordance with the provisions of POPIA and Innovation Group's Data Privacy policies. In addition, Innovation Group shall ensure that the third party to whom the personal information is transmitted has an adequate level of data protection.

8.5 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information

Innovation Group employs a multitude of safeguards in line with legislation. We are legally obliged to provide adequate protection for the Personal Information we hold and to stop unauthorised destruction, access and use, loss of or damage of personal information. We will, on an on-going basis, continue to review our security controls and related processes to ensure that your Personal Information is secured. Our security policies and procedures cover:

- Identifying all reasonable internal and external risks to personal information
- Acceptable usage of personal information;
- Access to personal information;
- Data encryption
- Data backups
- Defensive measures
- Anti-virus and anti-malware solutions
- Computer and network security;
- Investigating and reacting to security incidents.
- Monitoring access and usage of personal information;
- Physical security;
- Retention and disposal of information;
- Secure communications;

9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available

9.1.1 on <https://www.innovation.group/legal/za-regulatory-information/>

9.1.2 at the offices of Innovation Group South Africa located in Johannesburg, Sandton for public inspection during normal business hours;

9.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and

9.1.4 to the Information Regulator upon request.

9.2 A fee for a printed copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

10. UPDATING OF THE MANUAL

Innovation Group's Compliance Officer will on a regular basis update this manual.

Form 2

Request for access to record

(Regulation 7)

Note:

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

TO: The information Officer

155 West Street
Sandown
Sandton
2031

Email address: information.officer@innovation.group

Mark with "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			
Contact Numbers	Tel. (B):		Facsimile:
	Cellular:		
Full names of person on whose behalf request is made (if applicable):			
Identity Number			
Postal Address			
Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		Facsimile:
	Cellular:		

PARTICULARS OF RECORD REQUESTED

Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)

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

TYPE OF RECORD

(Mark the applicable box with an "X")

Record is in written or printed form	
Record comprises virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc)	
Record consists of recorded words or information which can be reproduced in sound	
Record is held on a computer or in an electronic, or machine-readable form	

FORM OF ACCESS

(Mark the applicable box with an "X")

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

MANNER OF ACCESS (Mark the applicable box with 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 (including transcriptions)	
E-mail of information (including soundtracks if possible)	
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	
<ul style="list-style-type: none"> 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 (please specify)

Signed at _____ this _____ day of _____ 20_____

Signature of Requestor / person on whose behalf request is made

FOR OFFICIAL USE

Reference number:	
Request received by: (State Rank, Name and Surname of Information Officer)	
Date received:	
Access fees:	
Deposit (if any):	

Signature of Information Officer

Form 3

Outcome of Request and Fees Payable

(Regulation 8)

Note:

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

Reference Number: _____

TO:

Your request dated _____, refers

1. You requested:

<p>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.</p>	
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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
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	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 (ii) Compact disc • If provided by requestor • If provided to the requestor	R40.00 R40.00 R60.00		
For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on the		
Copy of visual images			

	quotation of the service provider		
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		
TOTAL:			

5. Deposit payable (if search exceeds six hours):

Yes

No

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

Name of Bank: First National Bank
 Name of account holder: Innovation Group Services (Pty) Ltd
 Type of account: Current/Cheque Account
 Account number: 50610027994
 Branch Code: 254005
 Reference Nr: PAIA Charges (Customer Name)
 Submit proof of payment to: information.officer@innovation.group

Signed at _____ this _____ day of _____ 20 _____

 Ross Simmonds
 Information Officer