

ACCESS TO INFORMATION MANUAL

COMPENDIUM GROUP INVESTMENT HOLDINGS (PTY) LTD AND ITS SUBSIDIARIES AND ASSOCIATES ("MANUAL")

Prepared in accordance with Section 51 of the Promotion of Access to Information Act 2 of 2002 and the Protection of Personal Information Act 4 of 2013

April 2021

Compendium
GROUP INVESTMENT HOLDINGS

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1. DEFINITIONS

- 1.1. **"Compendium"** means Compendium Group Investment Holdings (Pty) Ltd with registration number 2004/029831/07 and all subsidiaries and associated companies which consists of:
 - 1.1.1. Compendium Insurance Brokers (Pty) Ltd with registration number 2000/009588/07;
 - 1.1.2. Cignet Administration Services (Pty) Ltd with registration number 2004/029524/07;
 - 1.1.3. Swift Auto Brokers (Pty) Ltd with registration number 2006/027398/07;
 - 1.1.4. Edge Insurance Brokers KZN (Pty) Ltd with registration number 2001/005734/07;
 - 1.1.5. Portdem (Pty) Ltd with registration number 2019/112944/07;
 - 1.1.6. GL Broking Enterprises (Pty) Ltd with registration number 2019/378521/07;
 - 1.1.7. Genesis Insurance Brokers KZN (Pty) Ltd with registration number 1989/003322/07; and
 - 1.1.8. Watersure (Pty) Ltd with registration number 2004/027733/07.
- 1.2. **"Data Subject"** means the person to whom personal information relates;
- 1.3. **"Manual"** means this manual together with all its annexure;
- 1.4. **"POPI"** means the Protection of Personal Information Act, 4 of 2013;
- 1.5. **"PAIA"** means Promotion of Access to Information Act, 2 of 2002;
- 1.6. **"Processing"** means any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including:
 - 1.6.1. the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
 - 1.6.2. dissemination by means of transmission, distribution or making available in any other form; or
 - 1.6.3. merging, linking, as well as restriction, degradation, erasure or destruction or information.
- 1.7. **"Record"** means any recorded information-
 - 1.7.1. regardless of form or medium, including writing on any material, information produced, recorded or stored by means of any tape-recorded, computer equipment, whether hardware or software or both, or other device, and any material subsequently derived from information so produced, recorded or stored. Any label, marking or other writing that identified or described any thing of which it forms part, or to which it is attached by any means, book, map, graph or drawing. Any photograph, film, negative, tape or other device in which one or more visual images are embodied so as to be capable, with or without the aid of some other equipment, of being reproduced;
 - 1.7.2. in the possession or control of a responsible party;

- 1.7.3. whether or not it was created by the responsible party; and
- 1.7.4. regardless of how it came into existence.

1.8. “Requester” has the meaning ascribed to it in section 1 of PAIA.

2. PURPOSE

The Promotion of Access to Information Act 2 of 2000 (“PAIA”) gives effect to the constitutional 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.

PAIA sets out the requisite procedures associated with any such requests for information. In terms of PAIA, where a request for information is made to a body, there is an obligation to provide the information, except where PAIA, expressly provides that the information may not be released.

PAIA balances the interests of Requester of information, as well as those of private entities needing to protect trade secrets and confidential information.

The purpose of this Manual is to:

- detail the procedure that a Requester for information is required to follow and the manner in which a Request for Access shall be facilitated by Compendium; and
- to detail the purpose for which personal information may be processed, a description of categories of Data Subjects for whom Compendium processes personal information, as well as the categories of personal information relating to such Data Subjects, and the recipients to whom personal information may be supplied.

3. AVAILABILITY OF THE MANUAL

The Manual is available for inspection at the offices of Compendium and available for download from <https://www.cig.co.za>.

4. COMPANY DETAILS

The details of Compendium, in terms of Section 51(1)(A) of PAIA are as follows:

Chief Executive Officer	Rowan Jones
Information Officer	Chantelle Jones
Physical address	Compendium House 5 The Crescent Westway Office Park Westville 3635

Postal address	P O Box 2800 Westway Office Park 3635
Telephone number	031 242 6800
E-mail address	info@cig.co.za

5. SECTION 10 GUIDE

The Guide was compiled by the South African Human Rights Commission ("SAHRC"), which contains information for the purposes of assisting a Requester in exercising their rights. The Guide is available in 11 official languages, and any queries can be directed to:

The South African Human Rights Commission – PAIA Unit	
Postal address	Private Bag X 2700 Houghton 2041
Physical Address	Forum 3 Braampark Offices 33 Hoofd Street Braamfontein 2017
Telephone number	011 877 3600
Fax number	011 403 0625
E-mail address	PAIA@sahrc.org.za
Website	www.sahrc.org.za

6. ACCESS TO RECORDS HELD BY THE COMPENDIUM

6.1. Records automatically available:

- 6.1.1. Brochures;
- 6.1.2. Pamphlets; and
- 6.1.3. Documents related to business activities.

6.2. List of applicable legislation:

Compendium retains records in terms of legislation, which legislation may include the right of a Requester to a Record, other than in terms of the procedure prescribed by PAIA. The following list of legislation can be reviewed to ascertain whether the Requester has the right to access a Record, which list includes, but is not limited to, legislation applicable to Compendium:

- 6.2.1. Basic Conditions of Employment Act, 75 of 1997, as amended
- 6.2.2. Board Based Black Economic Empowerment Act, No 53 of 2003
- 6.2.3. Collective Investments Schemes Control Act, 45 of 2002
- 6.2.4. Companies Act, 71 of 2008

- 6.2.5. Competition Act, 89 of 1998
- 6.2.6. Copyright Act, 98 of 1978
- 6.2.7. Electronic Communication and Transactions Act, 25 of 2002
- 6.2.8. Employment Equity Act No. 55 of 1998
- 6.2.9. Financial Advisory and Intermediary Services Act, 37 of 2002, as amended
- 6.2.10. Financial Intelligence Centre Act No. 38 of 2001, as amended
- 6.2.11. Financial Institutions (Protection of Funds) Act, 28 of 2001
- 6.2.12. Friendly Societies Act, 25 of 1956
- 6.2.13. Income Tax Act, 58 of 1962
- 6.2.14. Insurance Act, 18 of 2017
- 6.2.15. Labour Relations Act, 66 of 1995
- 6.2.16. Long-term Insurance Act, 52 of 1998
- 6.2.17. Medical Schemes Act, 131 of 1998
- 6.2.18. Occupational Health and Safety Act, 85 of 1993
- 6.2.19. Pension Funds Act, 24 of 1956
- 6.2.20. Short Term Insurance Act, 53 of 1998
- 6.2.21. Skills Development Act, 97 of 1998
- 6.2.22. Unemployment Contributions Act, 4 of 2002
- 6.2.23. Unemployment Insurance Act No. 63 of 2001
- 6.2.24. Value Added Tax Act No. 89 of 1991

6.3. Schedule of records held in accordance with any other legislation:

6.3.1. Statutory company information including:

- 6.3.1.1. Incorporation Documents
- 6.3.1.2. Memorandum of Incorporation
- 6.3.1.3. Minute's
- 6.3.1.4. Records of all subsidiary and associated companies
- 6.3.1.5. Register of Directors and Officers
- 6.3.1.6. Share registers and other statutory registers
- 6.3.1.7. Statutory returns to relevant authorities

6.3.2. Financial and Accounting Records including:

- 6.3.2.1. Accounting Records (inclusive of books of account)
- 6.3.2.2. Administrative Records
- 6.3.2.3. Internal and external audit reports
- 6.3.2.4. Schedules and documentation in support of clause 6.2.1 – 6.2.3 above.

6.3.3. Tax Records including:

- 6.3.3.1. Income tax returns and other documentation
- 6.3.3.2. PAYE Records
- 6.3.3.3. Skills Development Levies Records

- 6.3.3.4. Value Added Tax Record.
- 6.3.4. Legal Records including:
 - 6.3.4.1. Documentation pertaining to litigation and arbitration
 - 6.3.4.2. General agreements
 - 6.3.4.3. Licenses, permits and authorizations
 - 6.3.4.4. Insurance Records including records in respect of insurance coverage, limits and insurers
 - 6.3.4.5. Claims Records
- 6.3.5. Employee Records including:
 - 6.3.5.1. Attendance register
 - 6.3.5.2. Company tax submissions in respect of employee
 - 6.3.5.3. Employment Agreements
 - 6.3.5.4. Confidentiality agreements
 - 6.3.5.5. Restraint of Trade Agreements
 - 6.3.5.6. Disciplinary Records
 - 6.3.5.7. Employee personal details
 - 6.3.5.8. Employment conditions and policies
 - 6.3.5.9. Employment equity plan
 - 6.3.5.10. Medical aid Records
 - 6.3.5.11. Remuneration and benefits records
 - 6.3.5.12. Retirement fund records
 - 6.3.5.13. Training manuals and material
 - 6.3.5.14. Dividend payment list
- 6.3.6. Marketing Records including:
 - 6.3.6.1. Marketing and advertising records
- 6.3.7. Customer Records including
 - 6.3.7.1. Agreements and Forms
 - 6.3.7.2. Payment details
 - 6.3.7.3. Sales Records
 - 6.3.7.4. Policy documents and wordings
 - 6.3.7.5. Transaction records
 - 6.3.7.6. Disclosures
- 6.3.8. Supplier, Service Provider and Landlord records including
 - 6.3.8.1. Terms and conditions, service level agreements and rental agreements
 - 6.3.8.2. Transactional Records and supporting information

6.3.9. Information technology including

6.3.9.1. Business and data information

6.3.9.2. Domain name registrations

6.3.9.3. IT technology capabilities

6.3.9.4. Asset Registers

6.3.10. Intellectual property

6.3.10.1. Trademarks, trade names and protected names

6.3.10.2. Agreements pertaining to intellectual property

7. ACCESS REQUEST PROCEDURE

7.1. The Requester must use the prescribed form attached hereto as Annexure A to make the request for access to a Record to the above Compendium address, fax number or email address for the attention of the Information Officer. The prescribed form must be completed in full and contain sufficient information in order for the Information Officer to process the Request.

7.2. The Information officer will notify the Requester of the prescribed fee (if any) payable and the payment details before further processing the request. An initial, non-refundable request fee of R50.00 (excl VAT) is payable save for instances where a Data Subject seeks access to a Record containing their own personal information in terms of POPI, in which instance a request fee will not be payable. Should a request fee be payable, the Information Officer will require the Requester to provide proof of payment.

7.3. The Information Officers will, within 30 days of receipt of the Request, decide whether to grant or decline the Request and notice with reasons (if required) will be provided. In the event that a large volume of information is requested or the Information Offices is required to search through a large volume of Records, the 30 day period in terms of which the Information Officer must decide whether to grant or refuse the Request may be extended for a further period, not exceeding 30 days. The Requester will be notified by the Information Officer of any extension sought.

7.4. Should the Information Officer be unable to locate a Record, or the Record does not exist, the Information Officer will, by means of an affidavit or attestation, notify the Requester which will include information in respect of the steps taken to locate the Record.

7.5. In the event that the Request for Access to a Record is unsuccessful, the Requester will be notified by the Information Officer, which notification will include:

7.5.1. Adequate reasons for the refusal.

7.5.2. The Requester's right to lodge to apply to a court for relief within 180 days of notification of the decision for appropriate relief in accordance with sections 56(3) (c) and 78 of PAIA.

7.6. The Information Officer may refuse access to a Record in the following instances:

- 7.6.1. protecting personal information about a third person (who is a natural person), including a deceased person, from unreasonable disclosure;
- 7.6.2. protecting commercial information that is held about a third party or a particular company or entity (for example trade secrets: financial, commercial, scientific or technical information that may harm the commercial or financial interests of the organization or the third party);
- 7.6.3. if disclosure of the Record would result in a breach of a duty of confidence owed to a third party in terms of an agreement;
- 7.6.4. if disclosure of the Record would endanger the life or physical safety of an individual;
- 7.6.5. if disclosure of the Records would prejudice or impair the protection of a person in accordance with a witness protection scheme;
- 7.6.6. if disclosure of the Record would prejudice or impair the protection of the safety of the public;
- 7.6.7. the Record is privileged from production in legal proceedings, unless the legal privilege has been waived;
- 7.6.8. disclosure of the Record (containing trade secrets, financial, commercial, scientific, or technical information) would harm the commercial or financial interests of Compendium;
- 7.6.9. the Record is a computer programme; and
- 7.6.10. the Record contains information about research being carried out or about to be carried out on behalf of a third party or Compendium.

7.7. If the request is granted the Requester will be notified by the Information Officer and a further fee must be paid. This would be for the search, reproduction, preparation and time that exceed the prescribed hours to search for and prepare the Records.

7.8. If access is requested to a Record that contains information about a third party, the Information Officer is obliged to attempt to contact this third party to inform them of the request. This enables the third party the opportunity of responding by either consenting to the access or by providing reasons why the access should be denied. In the event of the third-party furnishing reasons for the support or denial of access, the Information Officer will consider these reasons in determining whether access should be granted, or not.

8. PROTECTION OF PERSONAL INFORMATION ACT

8.1. POPI regulates and controls the Processing, collection, use, and transfer of personal information relating to identifiable, living, natural persons and juristic persons.

8.2. In terms of POPI, the definition of personal information includes, but is not limited to:

- 8.2.1. Name
- 8.2.2. Address
- 8.2.3. Contact Details
- 8.2.4. Date of birth
- 8.2.5. Place of birth
- 8.2.6. Identity Number

- 8.2.7. Passport Number
- 8.2.8. Bank details
- 8.2.9. Tax Number
- 8.2.10. Financial Information
- 8.2.11. Marital Status

8.3. In terms of POPI, Compendium has a legal duty to collect, use, transfer and destroy another's (Data Subject) personal information in a lawful, legitimate and responsible manner.

8.4. Compendium Processes personal information in respect of, but not limited to, the following Data Subjects:

- 8.4.1. Employees, Contractors, Consultants, Job applicants, Directors, Learnership Candidates, Representatives (as defined in the Financial Advisory and Intermediary Services Act, 2002.
- 8.4.2. Clients
- 8.4.3. Suppliers and Service Providers
- 8.4.4. Regulators of Public Bodies
- 8.4.5. Persons who physically interact with the Company at the Company's offices or through e-mail, fax, WhatsApp, websites and other means of electronic communication
- 8.4.6. Third-parties involved in insurance claims
- 8.4.7. Potential business partners

8.5. Compendium Processes personal information (without limitation):

- 8.5.1. in accordance with its business objectives and strategies;
- 8.5.2. to comply with its legal and contractual obligations;
- 8.5.3. in order to make contact with, or attend to a Data subjects queries or instructions;
- 8.5.4. to identify Data Subjects;
- 8.5.5. to pursue the legitimate interest of Compendium or the Data Subject;
- 8.5.6. to provide the data subject with information, which includes information about marketing. in respect of Compendium;
- 8.5.7. to provide, maintain and improve its services;
- 8.5.8. to perform operational, human resource and legal requirements; and
- 8.5.9. to prevent fraud and abuse of Compendium's processes, systems and operations.

8.6. Compendium will ensure that all Personal information is treated with caution and will implement reasonable security measures to protect your Personal information.

8.7. Once the Data Subject's Personal Information is no longer required due to the fact that the purpose for which the Personal Information was held has come to an end or expired, such Personal Information will be safely and securely archived for the required periods, as prescribed by law. Compendium will thereafter ensure that such Personal Information is permanently destroyed.

8.8. In the event that a Data Subject requires details of the Personal Information Compendium holds, the Data Subject must submit a request in accordance with 7 of this Manual.

ANNEXURE A
FORM FOR REQUEST FOR ACCESS TO A RECORD

REQUEST FOR ACCESS TO RECORD OF A PRIVATE BODY

Section 53(1) of the Promotion of Access to Information Act, 2000 (Act No 2 of 2000)

(Regulation 4)

Particulars of private body

Postal Address	Physical Address
<i>The Information Officer</i>	<i>The Information Officer</i>
PO Box 2800	Compendium House, 5 The Crescent
Westville	Westway Office Park, Westville
3635	3635
Tel: (031) 242 6800	E-mail: info@cig.co.za
Fax: 086 238 6788	Website: www.cig.co.za

Particulars of person requesting access to the record

a) The particulars of the person who requests access to the records must be recorded below.	
b) Furnish an address and/or fax number in the Republic to which information must be sent.	
c) Proof of the capacity in which the request is made, if applicable, must be attached.	
Full names and surname	
Identity number	
Postal address	
Telephone number	Fax number
E-mail address	
Capacity in which request is made, when made on behalf of another person	

A. 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 names and surname	
Identity number	

B. Particulars of record

a) 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.

b)	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.
1.	Description of record or relevant part of the record:
2.	Reference number, if available:
3.	Any further particulars of record:

Fees

a)	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.
b)	You will be notified of the amount required to be paid as the request fee.
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 therefore.
	Reason for exemption from payment of fees

Form of access to record

If you are prevented by a disability to read, view or listen to the record in the form of access provided for in 1 to 4 hereunder, state your disability and indicate in which form the record is required.	
Disability	Form in which record is required

Mark the appropriate box with an "X" NOTES: a) Your indication as to the required form of access depends on the form in which the record is available. b) Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form. c) The fee payable for access to the record, if any, will be determined partly by the form in which access is requested.			
1. If the record is in written or printed form:			
<input type="checkbox"/>	Copy of record*	<input type="checkbox"/>	Inspection of record
2. If record consists of visual images: (this includes photographs, slides, video recordings, computer-generated images, sketches, etc.)			
<input type="checkbox"/>	View the images	<input type="checkbox"/>	Copy of the images*
<input type="checkbox"/>		<input type="checkbox"/>	Transcription of the images*
3. If record consists of recorded words or information which can be reproduced in sound:			
<input type="checkbox"/>	Listen to the soundtrack (audio cassette)	<input type="checkbox"/>	Transcription of soundtrack* (written or printed document)
4. If record is held on computer or in an electronic or machine-readable form:			
<input type="checkbox"/>	Printed copy of record	<input type="checkbox"/>	Printed copy of information derived from the record*
<input type="checkbox"/>		<input type="checkbox"/>	Copy in computer readable form* (flash or compact disc)
*If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you? A postal fee is payable.			YES <input type="checkbox"/> NO <input type="checkbox"/>

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

D. Notice of decision regarding request for access:

You will be notified in writing whether your request has been approved or 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.
How would you prefer to be informed of the decision regarding your request for access to the record?

Signed at _____ this _____ day of _____ 20_____

SIGNATURE OF REQUESTER/PERSON ON
WHOSE BEHALF REQUEST IS MADE