PROMOTION OF ACCESS TO INFORMATION MANUAL

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

October 2026

1. DEFINITIONS

"Compendium" means Compendium Group Investment Holdings (Pty) Ltd with registration number 2004/029831/07 and all subsidiaries and associated companies which consists of:

- Compendium Insurance Brokers (Pty) Ltd with registration number 2000/009588/07; and
- Cignet Administration Services (Pty) Ltd with registration number 2004/029524/07;

"Data Subject" means the person to whom personal information relates;

"Manual" means this manual together with all its annexures;

"POPI" means the Protection of Personal Information Act 4 of 2013;

"PAIA" means Promotion of Access to Information Act 2 of 2000;

"Process", "Processes" and **"Processing"** means any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including:

- the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
- dissemination by means of transmission, distribution or making available in any other form; or
- merging, linking, as well as restriction, degradation, erasure or destruction of information.

"Record" means any recorded information 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 anything 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;

- in the possession or control of a responsible party;
- whether or not it was created by the responsible party; and
- regardless of how it came into existence.

"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

- 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

3.1. A copy of the Manual is available-

- On www.cig.co.za,;
- Head office of Compendium for public inspection during normal business hours;
- To any person upon request and upon the payment of a reasonable prescribed fee; and
- To the Information Regulator upon request.

3.2. A fee for a copy of the Manual, as per the prescribed form attached hereto as “Form 3 – Outcome of Request and Fees Payable”, shall be payable per each A4 size photocopy made.

4. COMPANY DETAILS

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

Chief Executive Officer	Dinilesizwe Nondumo
Information Officer	Jeremiah Moodley
Physical address	Compendium House, 5 The Crescent, Westway Office Park, Westville, 3635
Postal address	P.O Box 2800 Westway Office Park 3635
Telephone number	0312426800
E-mail address	info@cig.co.za

5. SECTION 10 GUIDE IN HOW TO USE THE ACT

5.1. The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised 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.

5.2. The aforesaid Guide contains the description of-

5.2.1. the objects of PAIA and POPIA;

5.2.1.1. the postal and street address, phone and fax number and, if available, electronic mail address of-
5.2.1.2. the Information Officer of every public body, and
5.2.1.3. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA;

5.2.2. the manner and form of a request for-

5.2.2.1. access to a record of a public body contemplated in section 11; and
5.2.2.2. access to a record of a private body contemplated in section 50;

5.2.3. the assistance available from the Information Officer of a public body in terms of PAIA and POPIA;

5.2.4. the assistance available from the Regulator in terms of PAIA and POPIA;

5.2.5. 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-

5.2.5.1. an internal appeal;
5.2.5.2. a complaint to the Regulator; and

5.2.5.3. 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.

5.2.6. 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;

5.2.7. the provisions of sections 15 and 52 providing for the voluntary disclosure of categories of records by a public body and private body, respectively;

5.2.8. the notices issued in terms of sections 22 and 54 regarding fees to be paid in relation to requests for access; and

5.2.9. the regulations made in terms of section 92.

5.3. 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.

5.4. The Guide can also be obtained -
5.4.1. upon request to the Information Officer;
5.4.2. from the website of the Regulator - https://inforegulator.org.za/
5.4.3. this Guide is only available in English.

6. ACCESS TO RECORDS HELD BY COMPENDIUM

6.1. Records automatically available:

6.1.1. Brochures;
6.1.2. Pamphlets; and
6.1.3. Documents that are not confidential in nature

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:

- Basic Conditions of Employment Act, 75 of 1997, as amended
- Board Based Black Economic Empowerment Act, No 53 of 2003
- Collective Investments Schemes Control Act, 45 of 2002
- Companies Act, 71 of 2008
- Competition Act, 89 of 1998
- Copyright Act, 98 of 1978
- Electronic Communication and Transactions Act, 25 of 2002
- Employment Equity Act No. 55 of 1998
- Financial Advisory and Intermediary Services Act, 37 of 2002, as amended
- Financial Intelligence Centre Act No. 38 of 2001, as amended
- Financial Institutions (Protection of Funds) Act, 28 of 2001
- Friendly Societies Act, 25 of 1956
- Income Tax Act, 58 of 1962
- Insurance Act, 18 of 2017
- Labour Relations Act, 66 of 1995
- Long-term Insurance Act, 52 of 1998
- Medical Schemes Act, 131 of 1998
- Occupational Health and Safety Act, 85 of 1993
- Pension Funds Act, 24 of 1956
- Short Term Insurance Act, 53 of 1998

- Skills Development Act, 97 of 1998
- Unemployment Contributions Act, 4 of 2002
- Unemployment Insurance Act No. 63 of 2001
- 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 Minutes
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 (including 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 “Form 2 – Request for Access to Record” 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 attend to the Request.

7.2. A prescribed request fee may be payable in terms of the PAIA Regulations, as amended from time to time. A Requester seeking access to a record containing their own personal information will not be required to pay a request fee. Where a request fee is payable, the Information Officer will notify the Requester and require proof of payment before further processing the request.

7.3. The Information Officer 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 Officer 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. the Record is privileged from production in legal proceedings, unless the legal privilege has been waived;
7.6.6. disclosure of the Record (containing trade secrets, financial, commercial, scientific, or technical information) would harm the commercial or financial interests of Compendium
7.6.7. 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.

7.9. Remedies available when an FSP refuses a Request:

7.9.1. Internal Remedies

The FSP does not have internal appeal procedure. The decision made by the Information Officer is final. Requesters will have to exercise such external remedies at their disposal if the request for information is refused, and the Requestor is not satisfied with the answer supplied by the Information Officer.

7.9.2. External Remedies

A Requestor that is dissatisfied with the Information Officer's refusal to disclose information, may:

7.9.2.1. lodge a complaint with the Information Regulator in terms of sections 77A to 77K of PAIA where applicable at:

- PAIAComplaints@inforegulator.org.za;
- enquiries@inforegulator.org.za;
- www.inforegulator.org.za; or

7.9.2.2. apply to a Court for relief. For purposes of the Act, the Courts that have jurisdiction over these applications are the Constitutional Court, the High Court or another court of similar status and a Magistrate's Court designated by the Minister of Justice and Constitutional Development, and which presided over by a designated Magistrate.

7.10. Fees payable for request

7.10.1. 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
7.10.2. If the preparation or search for the requested record requires more than the hours prescribed, the head of the

private body may require the Requester to pay a deposit, which may not exceed one third of the total access fee payable, before further attendance to the request.

7.10.3. The notice requesting payment of a request fee or deposit must indicate the amount payable, inform the Requester of their right to lodge a complaint with the Information Regulator or apply to a court against the payment of the fee or deposit, as well as the procedure and timeframes for doing so.

7.10.4. Any deposit paid by the requester must be refunded if access to the requested record is refused

7.10.5. The private body is entitled to withhold the requested record until all applicable fees have been paid

7.10.6. Once access is granted, the requester must pay an access fee for the reasonable costs of searching for, preparing, and reproducing the record, where this exceeds the prescribed free hours.

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
8.2.12. Biometric information
8.2.13. Medical information
8.2.14. Criminal behaviour information

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, 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. with consent where required;
8.5.2. to perform in terms of a contract;
8.5.3. in accordance with its business objectives and strategies;
8.5.4. to comply with its legal and contractual obligations;
8.5.5. in order to make contact with, or attend to a Data subjects' queries or instructions;
8.5.6. to identify Data Subjects;
8.5.7. to pursue and protect the legitimate interests of Compendium or the Data Subject;
8.5.8. to provide the data subject with information, which includes information about marketing. In respect of Compendium;

8.5.9. to provide, maintain and improve its services;
8.5.10. to perform operational, human resource and legal requirements; and
8.5.11. to prevent fraud and abuse of Compendium's procedures, systems and operations.

8.6. Third-Party Processing and International Transfers

Compendium may disclose or make personal information available to authorised operators, service providers, insurers, underwriters, administrators, regulators and professional advisers where necessary to conduct its business operations, fulfil contractual obligations or comply with legal and regulatory requirements. Personal information may, where appropriate and subject to the requirements of POPIA, be stored or processed using cloud-based systems or transferred to service providers located outside the Republic of South Africa, provided that appropriate safeguards are in place to protect such information.

8.7. Compendium will ensure that all Personal information is treated with caution and will implement reasonable security measures to protect your Personal information. The rights of Data Subjects (as limited by prevailing laws and regulations) include the right to:

- access;
- correction;
- objection;
- deletion;
- not be subject to direct marketing; and
- lodge a complaint with the Information Regulator.

8.8. 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.

8.9. 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.

9. COMPLAINTS

Should your PAIA request be denied or there is no response from a public or private bodies for access to records you may lodge a complaint at the following email addresses/website:

- PAIAComplaints@inforegulator.org.za
- enquiries@inforegulator.org.za
- www.inforegulator.org.za

Approval and Sign-Off

Revision History

Version #	Author	Date	Nature of Revision
Version 4	J.L Moodley	October 2026	Review

Operational Approvals

This document has obtained the following approvals:

Title/Function	Name	Document Version	Approval Signature	Date
CEO	D. Nondumo	Version 4		9 November 2026