



**PROMOTION OF ACCESS TO INFORMATION ACT
MANUAL**

for

**SANLAM RETAIL MASS
("SRM")**

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

Sanlam Retail Mass – PAIA Manual (Approved_11 2022)

1. INTRODUCTION

- 1.1 The Promotion of Access to Information Act 2 of 2000 aims to give effect to the constitutional right of access to information: (i) subject to justifiable limitations, including limitations aimed at the reasonable protection of privacy, commercial confidentiality and effective, efficient and good governance; and (ii) in a manner which balances that right with other rights including those entrenched in the Bill of Rights in Chapter 2 of the Constitution of the Republic of South Africa. The purpose of the Act, amongst others, is to give effect to the constitutional right of access to information held by private bodies for the exercise of or protection of rights and to establish the procedures to give effect to that right, as swiftly and inexpensively as reasonably possible.
- 1.2 Section 51 of the Act requires a private body to compile a manual (the Manual) which details the requisite procedural issues attached to a request for information, the prescribed rates, the requirements which such request must meet as well as the grounds for refusal or partial refusal of such request. Please refer to the sections below for more information.
- 1.3 This Manual applies to Sanlam Retail Mass entities which includes the following licenced entities, Sanlam Developing Markets Limited (“**SDM**”), Safrican Insurance Company Limited (“**Safrican**”) and African Rainbow Life Limited (“**ARL**”).

2. PURPOSE OF THIS MANUAL

- 2.1 The purpose of this Manual is to:
- 2.1.1 provide a description of the available records for SRM entities;
 - 2.1.2 provide a description of the personal information processing activities by SRM entities, as prescribed by the Act;
 - 2.1.3 facilitate any request for information a requester may have under the Act, required for the protection or exercise of any right. Such a request may however be subject to justifiable limitations, as per Part 3, Chapter 4 of the Act; and
 - 2.1.4 to assist with procedures to be followed relating to requests for accessing records held by SRM entities.

3. WHO MAY REQUEST ACCESS TO THE INFORMATION HELD

- 3.1 This Manual is designed to facilitate requests for information from a requester (which includes a data subject as defined in the Protection of Personal Information Act 4 of 2013). In terms of section 50 of the Act, a requester must be given access to any record held by a private body where:
- that record is required for the exercise or protection of any rights;
 - the requester complies with the procedural requirements in terms of the Act pertaining to a request for access; and
 - access to that record is not refused in terms of any of the grounds for refusal listed in the Act.
- 3.2 The above-mentioned request includes access to a record containing personal information of the requester or the person on whose behalf the request is being made.
- 3.3 A requester has the right to ask SRM entities to confirm whether or not it holds personal information of the requester, free of charge. Additionally, a requester may request that SRM entities provide a record or description of the personal information of the requester held by SRM entities as well as the information regarding the identity of all third parties or categories of third parties, who have, or have had, access to the personal information:
- within a reasonable time;
 - at the prescribed fee, if any;
 - in a reasonable manner and format; and
 - in a form that is generally understandable.
- 3.4 Please note that if a requester requires a record or description of the personal information held by SRM entities, a written estimate of the fee (determined in accordance with the Regulations of the Act) will be provided to the requester and a deposit may be required.
- 3.5 A requester, in relation to a private body, means:
- any person, including, but not limited to, a public body or an official thereof,
 - making a request for access to a record of that private body; or
 - a person acting on behalf of the person contemplated above.
- 3.6 Should a request be made on behalf of another person or entity, the requester must submit details and proof of the capacity in which the requester is making a request, to the satisfaction of SRM entities.

3.7 Where a public body requests access to information from SRM entities, for the exercise or protection of any rights, other than its rights, it must be acting in good faith and in the interest of the public.

4. TYPES OF RECORDS HELD

4.1 Records are held and made available in terms of the legislation listed in **Annexure “A”** as applicable to all SRM entities.

4.2 The following records are automatically available to any requester requesting this information, therefore not necessary to apply for access thereto in terms of the Act:

4.2.1 SRM entities’ annual financial statements; and

4.2.2 SRM entities’ external audit reports.

4.3. The following other records are held by Sanlam Retail Mass entities:

Company Records subjects:	
• Finance	• Marketing
• Actuarial	• Information Technology
• Operations	• Human resources
• Distribution	• All records kept in terms of the Company Laws of South Africa
• Marketing	
Subjects on whom records are held:	
• Shareholders	• Subsidiary companies
• Policyholders	• Advisers
• Directors	• Brokers
• Employees	• Clients (Natural and Juristic Persons)
• Prospective Employees	• Banking institutions
• Applicants	• External companies/ contractors
• Officials	• Third-party Service Providers
• Consultants	• Associate Companies and Joint Ventures
• Beneficiaries	• Auditors
Records held in respect of the above-mentioned subjects	
• Confidential	• Scientific
• Personal	• Research
• Commercial	• Operational
• Financial	• Trade
• Group/company incorporation	• Business
• Group/company financial	• Internal group/ company divisions
• Group/company departments	• Group/ company structure
• Strategy	• Operational
• Contractor	• Policyholder

• Medical	• Shareholder
• Information technology	• External Companies
• Client	• Broker
• Product and services	• Directors
• Contracts	• Employee
• Rules of Funds	• Banking institutions
• Statutory required reports	• Official/legal
• Board of Trustee decisions	• Trustees
• Unsecured loans	

5. PRESCRIBED FEES

- 5.1. The tariffs relating to a request are determined in accordance with the Regulations of the Act.
- 5.2. In order to access any records the requester must complete the prescribed form/s with sufficient detail.
- 5.3. The completed form must be forwarded to the Information Officer or Deputy Information Officer whose details are provided below (see section 7).
- 5.4. Once the completed form has been submitted the Information Officer or Deputy Information Officer will advise the requester if any fees will be payable and the payment methods and provide the requester with a written estimate of the fees which will be payable.
- 5.5. The Information Officer or Deputy Information Officer shall by notice request the requester to pay the prescribed fee before processing of the request further.
- 5.6. Please note that a request will not be processed until the request fee and the deposit (where applicable) has been paid.

6. DECISION

- 6.1. The Information Officer or Deputy Information Officer will, as soon as reasonably possible, but within 30 days (or such other extended period determined and notified by the Information Officer or Deputy Information Officer, subject to the provisions of the Act), after the request has been received or after the requisite information pertaining to the request has been received:
 - 6.1.1. decide, in accordance with the Act, whether to grant the request;
 - 6.1.2. inform the requester of their right to correct any personal information; and
 - 6.1.3. notify the requester of the aforementioned decision.

- 6.2. Where the request is granted, the notice must contain the access fee applicable, the form in which access will be given; and outline the requisite dispute resolution procedures available to the requester should they be dissatisfied with the outcome.
- 6.3. Information, or parts thereof, may be refused in accordance with the grounds for refusal listed in Part 3, Chapter 4 of the Act.
- 6.4. Information which does not fall within the ambit of a recognised ground for refusal must be disclosed.
- 6.5. If all reasonable steps have been taken to find a record, and such a record cannot be found or if the records do not exist, then the Information Officer or Deputy Information Officer will notify the requester, by way of an affidavit or affirmation, that it is not possible to give access to the requested record.

7. THE PROCESSING OF PERSONAL INFORMATION

7.1 The Purpose SRM entities collect and process personal information:

- to meet our responsibilities to our customers;
- to meet our responsibilities to employees;
- to meet our contractual responsibilities to third-party service providers;
- to inform customers of products and services;
- to comply with all legal and regulatory requirements, including industry codes of conduct;
- to protect and pursue the legitimate interests of Sanlam, SRM entities or third parties to whom personal information is provided; and
- for any further purposes related to the above.

For more information please visit Sanlam Group's Privacy Notice at www.sanlam.co.za

7.2 Categories of data subjects

• Shareholders	• Suppliers and service
• Subsidiary companies	• Investors
• Joint ventures	• Policyholders and beneficiaries
• Advisors	• Complainants
• Independent brokers	• Claimants
• Directors	• Professional advisers
• Employees	• Consultants
• Customers	• Trustees
• Officials	• Pension Fund Members
• Banking institutions	• Employers and Employees of other

	organisations
• Consultants	• Prospective employees
• External companies / contractors	• Leads or prospective customers
• Board Members	

7.3 Classes of personal information processed

• Personal details	• Employment details
• Financial details	• Goods or services provided
• Lifestyle and medical information	• Special personal information
• Education details	• Personal opinions and preferences

7.4 Personal information may be received from or supplied to:

- any regulatory authority (such as the Financial Sector Conduct Authority) and the regulators they appoint for the various financial sectors;
- comply with any regulation passed under the relevant legislation, or any other legal process;
- any legal or juristic person with an appropriate legal basis;
- an executor of an estate, beneficiaries, or any other authorised representative;
- pension fund administrators;
- brokers, advisers, or intermediaries;
- companies within the Sanlam Group;
- law enforcement agencies;
- media outlets; and
- third-party service providers.

7.5 Trans border flow of information

Further processing and storage may require that SRM entities send personal information to service providers outside of the Republic of South Africa. SRM entities will not send your information to a country that does not have information protection legislation similar to that of the RSA, unless we have ensured that the recipient agrees to effectively adhere to the principles for processing of information in accordance with the Protection of Personal Information Act No 4 of 2013.

7.6 Sanlam and SRM entities' security practices

Information Security deals with Sanlam and SRM entities' information and Information Technology security capability and practices. Information Security deals specifically with the preservation of:

- Confidentiality: ensuring that information is accessible only to those authorised to have access;
- Integrity: safeguarding the accuracy and completeness of information and processing methods; and
- Availability: ensuring that authorised users have access to information and associated assets when required.

Information Security is achieved by implementing a suitable set of responsibilities, controls, standards, processes and systems to ensure that the Information Security objectives of Sanlam and SRM entities are met, and as such Information Security is a tight domain in Sanlam and SRM entities, that ensures:

- Rules are set for secure conduct and earning trust
- The rules are followed by participants.
- Trust is established between parties, notably:
 - Client and Partner trust in Sanlam and SRM entities' reputation through trust in Sanlam and SRM entities' systems; and
 - Sanlam and SRM entities' trust in interacting Client and Partner identities and their reputation.
- The security intelligence network that extends outside the organisation.
- Business is enabled because participants know it is safe to participate and know what is expected from them and what can be expected from other participants.
- Adequate monitoring and detection capabilities are maintained.
- Organised responses to incidents are effective and followed through into learning.

8. Requests in terms of the Protection of Personal Information Act

8.1 The Protection of Personal Information Act (POPIA) allows a data subject, after having provided adequate proof of their identity, the right to:

- Request SRM entities to confirm, free of charge, whether or not SRM entities holds their personal information;
- Submit a request for a record or description of their personal information;
- Submit a request for access to their own personal information (by completing Form 2 of the PAIA Regulations);
- Object to their personal information being processed (by completing Form 1 of the POPIA Regulations); and

- Submit a request for the correct or deletion of their personal information (by completing Form 2 of the POPIA Regulations).
- 8.2 Please send your completed form to the following email addresses or contact numbers:-
- 8.2.1 RMCompliance@sanlamsky.co.za or contact the Client Care Centre at 086 123 5433 for related queries;
- 8.2.2 SafricanIO@safrican.co.za or contact the Client Service Centre at 011 778 8000.
- 8.2.3 info@africanrainbowlife.co.za or contact our Service Call Centre on 010 880 5055 or 010 880 5005.
- 8.3 Before submitting a request in terms of POPIA, a data subject who is a customer of an SRM entity should consider whether other mechanisms for receiving their information are available. All Sanlam and SRM entities' customers are allowed to access their own information without lodging a formal POPIA request, the information a customer has access to includes, but is not limited to:
- Policy documentation;
 - Product information;
 - Product performance;
 - Tax certificates;
 - Personal details; and
 - Account information.
- 8.4 In order to access the above information please register and use our self-help functionality at <https://cp.sanlam.co.za/> or contact our Client Care Centre at life@sanlam.co.za or phone 086 072 6526 for Sanlam Life related queries.
- 8.5 For queries pertaining to Sanlam Retail Mass entities, please refer below:-
- 8.5.1 RMCompliance@sanlamsky.co.za or contact the Client Care Centre at 086 123 5433 for related queries;
- 8.5.2 SafricanIO@safrican.co.za or contact the Client Service Centre at 011 778 8000.
- 8.5.3 info@africanrainbowlife.co.za or contact our Service Call Centre on 010 880 5055 or 010 880 5005.

9. Information and Deputy Information Officer Details

9.1 Sanlam Developing Markets Limited (Registration Number: 1911/003818/06)

Name	Address	Email Address
Information Officer		
1. Bongani Madikiza	13 West Street, Houghton Estate, Johannesburg, 2198	Bongani.Madikiza@sanlam.co.za
Deputy Information Officer(s)		
1. Johann Grobler	13 West Street, Houghton Estate, Johannesburg, 2198	Johann.Grobler@sanlamsky.co.za
2. Nozipho Zwane	13 West Street, Houghton Estate, Johannesburg, 2198	NoziphoZ@sanlamsky.co.za

9.2 Safrican Insurance Company Limited (Registration Number: 1935/007463/06)

Name	Address	Email Address
Information Officer		
1. Phindile Riba	21 9 th Street, Houghton Estate, Johannesburg, 2198	Phindile.Riba@sanlamsky.co.za
Deputy Information Officer(s)		
1. Ana Ferreira	21 9 th Street, Houghton Estate, Johannesburg, 2198	AnaFe@safrican.co.za

9.3 African Rainbow Life Limited (Registration Number: 2018/329171/07)

Name	Address	Email Address
Information Officer		
1. Neo Lesela	1 Sturdee Avenue, Rosebank, Johannesburg, 2196	neol@africanrainbowlife.co.za

9. AVAILABILITY

9.1 This Manual, or any updated version hereof, is available:

- on the Sanlam website (located at www.sanlam.co.za).
- for public inspection, during normal business hours, at the principal places of business: -
 - **SDM** – (located at 13 West Street, Houghton Estate, Johannesburg, 2198);
 - **Safrican** – 21 9th Street, Houghton Estate, Johannesburg, 2198
 - **ARL** - 1 Sturdee Avenue, Rosebank, Johannesburg, 2196 or through contacting the relevant SRM entity at details provided in Section 8.5 of this Manual

- to any person upon request and upon the payment of the fee as determined by the Information Regulator; and
- to the Information Regulator upon request.

10. GUIDE OF THE INFORMATION REGULATOR

10.1 In terms of section 10 of the Act and the PAIA Regulations, the Information Regulator must make the guide available in all the official languages of the Republic of South Africa. The guide contains information on how to make use of the Act and to access information held by Private Bodies which impacts on a person's rights. The guide can be obtained from the SAHRC or from their website. Their contact details are as follows:

The Information Regulator (South Africa)

Physical/Postal Address : JD House, 27 Stiemens Street, Braamfontein,
Johannesburg, 2001

Email : enquiries@infoeregulator.org.za

Website : www.infoeregulator.org.za

Any person, may request a copy of the Guide, or any part thereof, from the Sanlam on a form that corresponds substantially with Form 1 of Annexure A to the Regulations.

ANNEXURE A

Records held in accordance with the following legislation:

Employment Equity Act (No. 55 of 1998)	Long-Term Insurance Act (No. 52 of 1998)
Skills Development Levies Act (No. 9 of 1999)	Inspection of Financial Institutions Act (No. 80 of 1998)
Labour Relations Act (No. 66 of 1995)	National Credit Act (No. 35 of 2002)
Basic Conditions of Employment Act (No. 75 of 1997)	Pension Funds Act (No. 24 of 1956)
Unemployment Insurance Act (No. 63 of 2001)	Financial Markets Act (No. 19 of 2012)
Compensation of Occupational Injuries and Diseases Act (No. 130 of 1993)	Financial Intelligence Centre Act (No. 38 of 2001)
Occupational Health and Safety Act (No. 85 of 1993)	Financial Advisory and Intermediary Services Act (No. 37 of 2002)
Income Tax Act (No. 58 of 1862)	Trade Marks Act (No. 194 of 1993)
Value Added Tax Act (No. 89 of 1991)	National Payment Systems Act (NO. 78 of 1998)
Insolvency Act (No. 24 of 1936)	Financial Institutions Protection of Funds Act (No. 28 of 2001)
Companies Act (No. 71 of 2008)	Cybercrimes Act (No. 19 of 2020)
Competition Act (No. 89 of 1998)	Regulation of Interception of Communications and Provision of Communications-related Information Act (No. 70 of 2002)
Consumer Affairs (Unfair Business Practices Act) (No. 71 of 2008)	Protection of Personal Information Act (No. 4 of 2013)
Consumer Protection Act (No. 68 of 2008)	Prevention of Organised Crime Act (No. 121 of 1998)
Administration of Estates Act (No. 66 of 1965)	Prevention and Combating of Corrupt Activities Act (No. 12 of 2014)
Prevention and Combating of Corrupt Activities Act (No. 12 of 2004)	South African Reserve Bank Act (No. 90 of 1989)
Insurance Act (No. 18 of 2017)	Copyright Act (No. 98 of 1978)
Financial Sector Regulation Act (No. 9 of 2017)	Arbitration Act (No. 42 of 1965)
Protection of Constitutional Democracy Against Terrorist and Related Activities Act (No. 33 of 2004)	
Medical Schemes Act (No. 131 of 1998)	

ANNEXURE B

List of Legal Entities to which this Manual Applies

Entity	Registration Number	Information Officer details	
Sanlam Developing Markets Limited	1911/003818/06	Bongani Madikiza	Bongani.Madikiza@sanlam.co.za
Safrican Insurance Company Limited	1935/007463/06	Phindile Riba	Phindile.Riba@sanlamsky.co.za
African Rainbow Life Limited	2018/329171/07	Neo Lesela	neol@africanrainbowlife.co.za