



# PROMOTION OF ACCESS TO INFORMATION ACT MANUAL

for

## **SANLAM LIMITED**

including the entities listed in Annexure "A" hereto

(Prepared in terms of section 51 of the Promotion of Access to Information Act, No. 2 of 2000)

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## 1. INTRODUCTION

- 1.1. Sanlam has over the years evolved from a traditional insurer to a diversified financial services provider with both a local and international footprint. Sanlam strives to be client centric and to treat its customers fairly, to understand the clients' needs and to provide innovative, tailored solutions to fulfil those needs. At Sanlam we link our clients' successes to our own and will continue to be accountable for our actions with the aim of building long-term relationships that improve peoples' lives.
- 1.2. The Promotion of Access to Information Act, No. 2 of 2000 ("**the Act**") was enacted on 3 February 2000 and gives effect to the constitutional right of access to information held by another person and that is required for the exercise or protection of any rights. If a public body is the requester, the public body must be acting in the public interest. If a request is made in terms of the Act, the body to whom the request is made is obliged to release the information, **except where the Act expressly provides that the information may or must not be released**. Requests in terms of the Act must be made in accordance with the prescribed procedures, at the rates provided. The forms and tariffs are dealt with in paragraphs 6 and 7 of the Act.
- 1.3. For more information on the Sanlam Group and its structure, please visit [www.sanlam.co.za](http://www.sanlam.co.za).

## 2. PURPOSE OF THIS MANUAL

- 2.1. This manual is designed to facilitate any request for information a requester may have under the Act and that is required for the exercise or protection of any right. Such a request may however be subject to justifiable limitations.
- 2.2. Wherever reference is made to "*entities*" in this manual, it will refer to the private bodies listed in Annexure "A" for whom this manual is drafted. For ease of reference, the use of the word "Sanlam" herein shall include reference to the other entities to which this Manual applies.

## 3. CONTACT DETAILS

- 3.1. Requests for information to any of the entities listed in Annexure "A" must be directed to:

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Head of Legal : Louis Venter  
Address (street): 2 Strand Street  
Bellville  
7530  
Address (postal): PO Box 1  
Sanlamhof  
7532  
Telephone No. : (021) 947 9111  
Fax No. : (021) 947 2653  
Email: : [Louis.venter@sanlam.co.za](mailto:Louis.venter@sanlam.co.za)

#### 4. GUIDE OF THE SOUTH AFRICAN HUMAN RIGHTS COMMISSION

In terms of Section 10 of the Act, the South African Human Rights Commission (SAHRC) published a guide 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:

Attention : The South African Human Rights Commission  
Postal Address : Private Bag X2700  
Houghton  
2041  
Telephone Nr : (011) 877 3803  
Fax Nr : (011) 403 0625  
Email : [paia@sahrc.org.za](mailto:paia@sahrc.org.za)  
Website : [www.sahrc.org.za](http://www.sahrc.org.za)

#### 5. TYPES OF RECORDS HELD

##### 5.1. Records made available in terms of applicable legislation

Records are held and made available in terms of the legislation listed in Annexure "B" as applicable to the entities listed herein.

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### 5.2. Records that is freely available

In terms of section 52(2) of the Act the Minister may from time to time publish a Notice in the Government Gazette describing those records which are freely available. As of date of this Manual, no such Notice has been published that applies to any entities listed herein.

### 5.3. Other Records held

<b><i>Products and Services subjects –</i></b>	
▪ Long-term insurance products	▪ Retirement annuities, Pension Funds
▪ Savings products	▪ Trust services
▪ Unit trust products	▪ Money transfer services
▪ Investment and risk products to groups and schemes	▪ Actuarial and consulting services to the group retirement industry
▪ All records kept in terms of legislation applicable to any of the above products or services and the Financial Services Industry in general	▪ Reward programme benefits, services and Reality Point balances ▪ Unsecured loans
<b><i>Company Records subjects –</i></b>	
▪ Finance	▪ Distribution
▪ Actuarial	▪ Marketing
▪ Client care	▪ Information technology
▪ Product management	▪ Human resources
▪ All records kept in terms of the Company Laws of South Africa	
<b><i>Subjects on whom records are held –</i></b>	
▪ Shareholders	▪ Subsidiary companies
▪ Policyholders	▪ Advisers
▪ Directors	▪ Brokers
▪ Employees	▪ Clients
▪ Officials	▪ Banking institutions
▪ Consultants	▪ External companies / contractors
▪ Investors	▪ Third Parties
▪ Auditors	▪ Associate Companies

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<b>Which records are held in respect of the above-mentioned subjects?</b>	
▪ 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
▪ Subsidiary companies	▪ External companies
▪ Adviser	▪ Broker
▪ Consultant	▪ Directors
▪ Information technology	▪ Employee
▪ Client	▪ Banking institutions
▪ Product and services	▪ Official/legal
▪ Contracts	▪ Policy documents
▪ Rules of Funds	▪ Board of Trustees decisions
▪ Statutory required reports	▪ Unsecured loans

## 6. GROUNDS FOR REFUSAL

In terms of the Act justifiable grounds exist for an entity to refuse or limit access to information. Grounds for refusal include, but are not only limited to these, are:

- Personal information relating to individuals;
- Certain types of commercial information;
- Information that is deemed confidential;
- Information that is deemed privileged;

## 7. FORM OF REQUEST AND PRESCRIBED FEES

7.1. In order to access any records the Requester must complete the prescribed form. The form can be accessed from [www.sanlam.co.za](http://www.sanlam.co.za) or can be requested from the Head of Legal (Sanlam Personal Finance).

7.2. The form must be completed with as much detail as possible and forwarded to the Head of Legal at the details provided in paragraph 3 above.

7.3. Once your form has been submitted the head of Legal will advise the Requester if any fees will be payable. The fees payable (if any) can be accessed from [www.sanlam.co.za](http://www.sanlam.co.za).

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**Annexure A**

	<b>LEGAL ENTITY</b>	<b>REGISTRATION NO</b>
1	Afflulink Nominees (Pty) Limited	2010/016470/07
2	Anglo African Finance (Pty) Limited	2002/011953/07
3	Associated Insurance Brokers 2006 (Cape)(Pty) Limited	2005/026692/07
4	Channel Life Limited	1969/012487/06
5	Completemed Healthcare Consultants (Pty) Limited	2001/012686/07
6	Eternity Healthcare (Pty) Limited	2002/022478/07
7	Eternity Private Health Fund Administrators (Pty) Limited	2002/015046/07
8	IFAnet Independent Distribution Services (Pty) Limited	2003/016850/07
9	Medipref Management Limited	1996/013711/09
10	Real Futures (Pty) Limited	2006/024152/07
11	Sanlam Developing Markets Limited	1911/003818/06
12	Sanlam Emerging Markets (Pty) Limited	2011/008562/07
13	Sanlam Fundshares Nominee (Pty) Limited	1998/02644/07
14	Sanlam Health Direct (Pty) Limited	2010/000102/07
15	Sanlam Healthcare Management (Pty) Limited	2007/022289/07
16	Sanlam Life Insurance Limited	1998/021121/06
17	Sanlam Limited	1918/001680/06
18	Sanlam Linked Investments (Pty) Limited	1987/006168/07

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20	Sanlam Personal Loans (Pty) Limited	2001/016316/07
21	Sanlam Share Account Nominee (Pty) Limited	1998/020664/07
22	Sanlam STI Administration (Pty) Limited	2007/030312/07
23	Sanlam Trust (Pty) Limited	1918/001689/06
24	Succession Financial Planning Advisory Services (Pty) Limited	2001/018056/07

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**Records are held in accordance with the following legislation:**

Administration of Estates Act (No. 66 of 1965)	Long-term Insurance Act (No. 52 of 1998)
Employment Equity Act (No. 55 of 1998)	Inspection of Financial Institutions Act (No. 80 of 1998)
Skills Development Levies Act (No. 9 of 1999)	National Credit Act (No. 35 of 2002)
Skills Development Act (No. 97 of 1998)	Pension Funds Act (No. 24 of 1956)
Labour Relations Act (No. 66 of 1995)	Financial Markets Act (No. 19 of 2012)
Employment Equity Act (No. 55 of 1998)	Financial Intelligence Centre Act (No. 38 of 2001)
Basic Conditions of Employment Act (No. 75 of 1997)	Financial Advisory and Intermediary Services Act (No. 37 of 2002)
Unemployment Insurance Act (No. 63 of 2001)	Collective Investment Schemes Act (No. 45 of 2002)
Compensation of Occupational Injuries and Diseases Act (No. 130 of 1993)	Trade Marks Act (No. 194 of 1993)
Occupational Health and Safety Act (No. 85 of 1993)	Participation Bonds Act (No. 55 of 1981)
Income Tax Act (No. 58 of 1962)	National Payment Systems Act (No. 78 of 1998)
Value Added Tax Act (No. 89 of 1991)	Financial Institutions Protection of Funds Act (No 28 of 2001)
Insolvency Act (No. 24 of 1936)	Regulation of interception of Communications and Provision of Communications-related Information Act (No. 70 of 2002)
Companies Act (No. 61 of 1973) Companies Act (No. 71 of 2008)	Protection of Personal Information Act (No. 4 of 2013)
Competition Act (No. 89 of 1998)	Prevention of Organised Crime Act (No. 121 of 1998)
Consumer Affairs (Unfair Business Practices Act) (No. 71 of 2008)	Trust Property Control Act (No. 57 of 1988)
Consumer Protection Act (No. 68 of 2008)	Prevention and Combating of Corrupt Activities Act (No. 12 of 2004)

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