



PROMOTION OF ACCESS TO INFORMATION ACT MANUAL

for

**SANLAM LIMITED
SANLAM LIFE INSURANCE LIMITED**

(and the entities listed in Annexure A)

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

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1. INTRODUCTION

- 1.1 With the passage of time the Sanlam Group (consisting of Sanlam Limited and its indirect and direct subsidiaries and associates) has evolved from a traditional insurance group to a diversified financial services group with both a local and international footprint. The Sanlam Group 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. The Sanlam Group links its clients' successes to its own and will continue to be accountable for its actions with the aim of building long-term relationships that improve peoples' lives. Wherever reference is made to "Sanlam" in this Manual, it will refer to the private bodies listed in Annexure A (being members of the Sanlam Group), the Heads' of whom have approved this Manual. Please note that this Manual only applies to Sanlam Group entities which are listed in Annexure A and separate PAIA manuals may be applicable in respect of those Sanlam Group entities which are not listed in Annexure A.
- 1.2 The Promotion of Access to Information Act, No 2 of 2000, as amended (the Act) was enacted on 3 February 2000 and 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.
- 1.3 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.

2. PURPOSE OF THIS MANUAL

2.1 The purposes of this Manual are to:

- 2.1.1 provide a description of the available records of Sanlam (see section 4);
- 2.1.2 provide a description of the personal information processing activities of Sanlam, as prescribed by the Act; and
- 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.

3. WHO MAY REQUEST ACCESS TO THE INFORMATION HELD

3.1 This Manual is designed to facilitate any request for information from a requester (which includes a data subject as defined in the Protection of Personal Information Act, No. 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 Sanlam to confirm whether or not it holds personal information of the requester, free of charge. Additionally, a requester may request that Sanlam provide a record or description of the personal information of the requester held by Sanlam 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 Sanlam, 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 Sanlam.
- 3.7 Where a public body requests access to information from Sanlam, 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. The following records are automatically available to any requester requesting this information, and therefore not necessary to apply for access thereto in terms of Section 52 of the Act:
- 4.1.1. The Sanlam annual Financial statements; and
- 4.1.2. The Sanlam interim audited report.

4.2. The following other records are held by Sanlam and are available in accordance with the legislation listed:

Category of Records	Applicable Legislation
<p>Products & Services</p> <ul style="list-style-type: none"> • Long-term insurance products • Savings Products • Unit Trust products • Investment and risk products to groups and schemes • All records kept in terms of legislation applicable to any of the above products or services and the Financial Services Industry in general • Retirement annuities, Pension Funds • Trust Services • Money transfer services • Actuarial and consulting services to the group retirement industry • Reward Programme benefits, services and Reality Point balances • Unsecured loans <p>Company records</p> <ul style="list-style-type: none"> • Finance • Actuarial • Client care • Product Management • Distribution • Marketing • Information technology • Human resources 	<p>Administration of Estates Act (No. 66 of 1965) Employment Equity Act (No. 55 of 1998) Skills Development Levies Act (No. 9 of 1999) Labour Relations Act (No. 66 of 1995) Basic Conditions of Employment Act (No. 75 of 1997) Unemployment Insurance Act (No. 63 of 2001) Compensation of Occupational Injuries and Diseases Act (No. 130 of 1993) Occupational Health and Safety Act (No. 85 of 1993) Income Tax Act (No. 58 of 1862) Value Added Tax Act (No. 89 of 1991) Insolvency Act (No. 24 of 1936) Companies Act (No. 61 of 1973) Companies Act (No. 71 of 2008) Competition Act (No. 89 of 1998) Consumer Affairs (Unfair Business Practices Act) (No. 71 of 2008) Consumer Protection Act (No. 68 of 2008) Trust Property Control Act (No. 57 of 1998) Prevention and Combating of Corrupt Activities Act (No. 12 of 2004) Insurance Act (No. 18 of 2017) Financial Sector Regulation Act (No. 9 of 2017) Protection of Constitutional Democracy Against Terrorist and Related Activities Act (No. 33 of 2004) Medical Schemes Act (No. 131 of 1998) Copyright Act (No. 98 of 1978) Arbitration Act (No. 42 of 1965) Long-Term Insurance Act (No. 52 of 1998) Inspection of Financial Institutions Act (No. 80 of 1998) National Credit Act (No. 35 of 2002)</p>

	<p>Pension Funds Act (No. 24 of 1956)</p> <p>Financial Markets Act (No. 19 of 2012)</p> <p>Financial Intelligence Centre Act (No. 38 of 2001)</p> <p>Financial Advisory and Intermediary Services Act (No. 37 of 2002)</p> <p>Collective Investment Schemes Act (No. 45 of 2002)</p> <p>Trade Marks Act (No. 194 of 1993)</p> <p>Participation Bonds Act (No. 55 of 1981)</p> <p>National Payment Systems Act (NO. 78 of 1998)</p> <p>Financial Institutions Protection of Funds Act (No. 28 of 2001)</p> <p>Cybercrimes Act (No. 19 of 2020)</p> <p>Regulation of Interception of Communications and Provision of Communications-related Information Act (No. 70 of 2002)</p> <p>Protection of Personal Information Act (No. 4 of 2013)</p> <p>Prevention of Organised Crime Act (No. 121 of 1998)</p> <p>South African Reserve Bank Act (No. 90 of 1989)</p>
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Subjects on whom records are held-	
<ul style="list-style-type: none"> • Shareholders • Policyholders • Directors • Employees • Prospective • Employees • Applicants • Officials • Consultants • Investors 	<ul style="list-style-type: none"> • Subsidiary companies • Advisers • Brokers • Clients • Banking institutions • External companies/ contractors • Third-party Service Providers • Associate Companies and Joint Ventures • Auditors
Which records are held in respect of the above-mentioned subjects?	
<ul style="list-style-type: none"> • Confidential 	<ul style="list-style-type: none"> • Scientific • Research

<ul style="list-style-type: none"> • Personal • Commercial • Financial • Group/company incorporation • Group/company financial • Group/company departments • Strategy • Contractor • Medical • Information technology • Client Product and services • Contracts • Rules of Funds • Statutory required reports • Board of Trustee decisions • Unsecured loans 	<ul style="list-style-type: none"> • Operational • Trade • Business • Internal group/ company divisions • Group/ company structure • Operational • Policyholder • Shareholder • External Companies • Broker • Directors • Employee • Banking institutions • Official/legal • Policy documents • Rules of Funds • Statutory required reports • Board of Trustee decisions • Unsecured loans
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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 of the processing

Sanlam collects and processes 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 or third parties to whom personal information is provided; and
- for any further purposes related to the above.

For more information please visit our Privacy Notice at www.sanlam.co.za

7.2 Categories of data subjects

Shareholders	Subsidiary companies	Joint ventures
Advisors	Independent brokers	Directors
Employees	Customers	Officials
Banking institutions	Consultants	External companies / contractors
Offenders and suspected offenders	Suppliers and service providers	Investors
Policyholders and beneficiaries	Complainants	Professional advisers
Trustees	Pension Fund members	Employers and employees of other organisations
Prospective employees	Leads or prospective customers	Board members

7.3 Classes of personal information processed

Personal details	Financial details	Lifestyle and medical information
Education details	Employment details	Goods or services provided
Special personal information	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 Transborder flow of information

Further processing and storage may require that Sanlam send personal information to service providers outside of the Republic of South Africa. Sanlam will not send your data or 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. In this regard, Sanlam has hosting service providers, mainly across the European Union (largely Germany and Ireland), the United Kingdom, and

some instances in the US and Canada, that may store personal information and various categories of records, as per section 4 above.

7.6 Sanlam's security practices

Information Security deals with Sanlam's information and IT 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 are met, and as such Information Security is a tight domain in Sanlam, 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's reputation through trust in Sanlam's systems; and
 - Sanlam 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 Sanlam to confirm, free of charge, whether or not Sanlam 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 Life@sanlam.co.za or contact the Client Care Centre at 086 072 6526 for Sanlam Life related queries. For queries pertaining to another Sanlam entity, please refer to Annexure A for the appropriate contact details of the individual Information Officer.
- 8.3 Before submitting a request in terms of POPIA, a data subject who is a customer of Sanlam should consider whether other mechanisms for receiving their information are available. All Sanlam 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. For queries pertaining to another Sanlam entity, please refer to Annexure A for the appropriate contact details.

9. CONTACT DETAILS

Requests for information to Sanlam Limited and Sanlam Life Insurance Limited must be directed to:

Information Officer : Jacques Marnewicke
Address (street) : 2 Strand Street
Bellville
7530
Address (postal) : PO Box 1
Sanlamhof
7532
Contact details : (021) 947 3718
Email address : InformationOfficer@sanlam.co.za

For queries pertaining to another Sanlam entity, please refer to Annexure A for the appropriate contact details of the individual Information Officer.

10. AVAILABILITY

10.1 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 place of business (located at 2 Strand Street, Bellville, 7532);
- to any person upon request and upon the payment of a reasonable prescribed fee and
- to the Information Regulator upon request.

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

11. GUIDE OF THE INFORMATION REGULATOR

11.1 The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available a 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. The Guide is available in each of the official languages and in braille.

11.2 The aforesaid Guide contains *inter alia* a description of-

11.2..1 The objects of PAIA and POPIA;

11.2..2 The manner and form of a request for access to a record of a private body;

11.2..3 the assistance available from the Regulator in terms of PAIA and POPIA; and

11.2..4 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.

- An internal appeal;
- a complaint to the Regulator; and
- an application with a court against a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;

11.3 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.

11.4 The guide can also be obtained-

11.4..1 Upon request to the Information Officer

11.4..2 From the website of the Regulator at (<https://info regulator.org.za>).

12. UPDATING OF THE MANUAL

Sanlam Limited will update this manual on a regular basis.

Issued by

Sanlam Life & Sanlam Limited Information Officer

ANNEXURE A

List of Legal Entities to which this Manual Applies

Entity	Registration number	Information Officer Details	
Acornhoek Plaza Share Block (Pty) Ltd	1988/000375/07	Jill Rose	InformationOfficer@sanlam.co.za
Afflulink Nominees (Pty) Ltd	2010/016470/07	Barend Wessels	bennie.wessels@sanlam.co.za
Jane Furse Plaza (Pty) Ltd	1994/001767/07	Jill Rose	InformationOfficer@sanlam.co.za
Kwagga Plaza Share Block (Pty) Ltd	1991/004604/07	Jill Rose	InformationOfficer@sanlam.co.za
Phoenix Industriële Park (Pty) Ltd	1967/012815/07	Jill Rose	InformationOfficer@sanlam.co.za
Rycklof-Beleggings (Pty) Ltd	1954/000136/07	Jill Rose	InformationOfficer@sanlam.co.za
San Lameer (Pty) Ltd	1964/003607/07	Jill Rose	InformationOfficer@sanlam.co.za
Sanlam Fundshares Nominee (Pty) Ltd	1998/020644/07	Jill Rose	InformationOfficer@sanlam.co.za
Sanlam Share Account Nominee (Pty) Ltd	1998/020664/07	Jill Rose	InformationOfficer@sanlam.co.za
U.R.D. Beleggings (Pty) Ltd	1963/006451/07	Jill Rose	InformationOfficer@sanlam.co.za
Sanlam Life Insurance Limited	1998/021121/06	Jacques Marnewicke	InformationOfficer@sanlam.co.za
Sanlam Limited	1959/001562/06	Jacques Marnewicke	InformationOfficer@sanlam.co.za
Sanlam Linked Investments (Pty) Ltd	1987/006168/07	Jill Rose	Jill.Rose@sanlam.co.za