



King Price Insurance Company Ltd

FSP no. 43862
Reg no. 2009/012496/06
Menlyn Corporate Park, Block A,
Cnr Garsfontein Road & Corobay Avenue,
Waterkloof Glen X11
Pretoria, 0181

PAIA manual

Published in terms of Section 51 of the
Promotion of Access to Information Act No. 2 of 2000.

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Introduction

King Price Insurance Company Ltd, FSP no. 43862, reg no. 2009/012496/06 with its registered address at Menlyn Corporate Park, Block A, Cnr Garsfontein and Corobay Avenue, Waterkloof Glen X11, Pretoria, 0181 (King Price) is a public company registered in terms of the company laws of South Africa which offers insurance products to clients and potential clients.

This manual is published in terms of Section 51 of the Promotion of Access to Information Act No. 2 of 2000 (the 'PAIA Act/manual') and provides an outline of the type of records and personal information which King Price holds. The manual also explains how to submit requests for access to these records in terms of the PAIA Act. In addition to explaining how to access, or object to, personal information held by King Price, or request correction of the personal information, in terms of Sections 23 and 24 of the Protection of Personal Information Act No. 4 of 2013 (the 'POPI Act'), the manual also explains how to submit requests for access to these records in terms of the PAIA Act.

The objective of the PAIA Act is to give effect to the constitutional right to access to information, which is held by a public or private body and which is required for the exercise or protection of any rights. The PAIA Act recognises the right entrenched in Section 32 of the Constitution of the Republic of South Africa (1996) and aims to foster a culture of transparency and accountability in public and private bodies by giving effect to the right of access to information.

Accordingly, requests for access to information held by King Price will be made in accordance with the prescribed procedures and at the rates provided. The prescribed forms and fee tariffs are dealt with in Chapter 1 of Part 3 of the PAIA Act.

Availability of this PAIA manual

This PAIA manual is published on the King Price website kingprice.co.za

Alternatively, a copy can be requested from the information officer or deputy information officer (see contact details below).

Availability of guides to the PAIA and POPI Acts

Guides to the PAIA and POPI Acts can be obtained and queries directed to:

PAIA Act		POPI Act	
The South African Human Rights Commission		The office of the Information Regulator	
Physical address	Braampark Forum 3 33 Hoofd Street Braamfontein Johannesburg Gauteng	Physical address	33 Hoofd Street, Forum III, 3rd Floor Braampark, Johannesburg, 2001
Postal address	Private Bag 2700, Houghton, 2041	Postal address	PO Box 31533 Braamfontein, Johannesburg, 2017
Phone no.	+27 11 877 3600	Phone no.	082 746 4173
Fax no.	+27 11 403 0625	Work no.	+27 10 023 5207
Email	PAIA@sahrc.org.za	Email	inforeg@justice.gov.za
Online	sahrc.org.za	Contact person	Marks Thibela
		Position	Chief executive officer

King Price's contact details

Contact details in terms of Section 51 of PAIA

King Price Insurance Company Limited	
FSP no.	43862
Reg no.	2009/012496/06
Physical address	Menlyn Corporate Park, Block A, Cnr Garsfontein and Corobay Avenue, Waterkloof Glen X11, Pretoria, 0181
Postal address	PO Box 284, Menlyn, Pretoria, Gauteng, 0063
Online	kingprice.co.za

Duly authorised persons

Information officer		Deputy information officer	
Name	Schalkwyk van der Merwe	Name	Schalk de Swardt
Phone no.	012 001 0800	Phone no.	012 001 0800
Email	schalkwyk.vdmerwe@kingprice.co.za	Email	schalk.deswardt@kingprice.co.za

Applicable legislation

The following legislation, among others which may become applicable from time to time, is applicable to (and observed by) King Price pursuant to undertaking its day-to-day operations:

Item no.	Legislative reference	Act
1	No. 71 of 2008	The Companies Act
2	No. 75 of 1997	The Basic Conditions of Employment Act
3	No. 55 of 1998	The Employment Equity Act
4	No. 58 of 1962	The Income Tax Act
5	No. 66 of 1995	The Labour Relations Act
6	No. 89 of 1991	The Value Added Tax Act
7	No. 37 of 2002	The Financial Advisory and Intermediary Services Act
8	No. 25 of 2002	The Electronic Communications and Transactions Act
9	No. 2 of 2000	The Promotion of Access to Information Act
10	No. 4 of 2013	The Protection of Personal Information Act
11	No. 63 of 2001	The Unemployment Insurance Act
13	No. 68 of 2008	Consumer Protection Act
14	No. 34 of 2005	National Credit Act
15	No 38 of 2001	Financial Intelligence Centre Act
16	No. 53 of 1998	Short term Insurance Act
17	No. 52 of 1998	Long term Insurance Act

Company records

Availability of King Price's records

Departmental records	Subject	Classification no.
Secretarial division	CIPC records	1
	Securities register	2/4
	Constitutional documents	1
	Records of resolutions and decisions	7/12
	Shareholders' agreements	5/6/7/8/12
	Health and safety records (employees and contractors)	4/5/8/9
Human resources division	Employee records	4
	Employment contracts	4
	Personnel guidelines, policies and procedures	3/12
	Employee medical records	4
	Employee disability insurance records	4/5
	Employee pension and provident fund records	4/5
	Payroll records	4/5
	Recruitment records	4/5/8/12
Financial division	Audited financial statements	12
	Tax records (King Price and employees)	12
	Asset register	12
	Supplier records	12
	Management accounts	12
	King Price records	12
Legal services and corporate governance division	General contract documentation	6/10/12
	Company guidelines, policies and procedures	3/12
	Intellectual property records	3/12
	Employee, client, partner, service provider and supplier information	2/4
	Immovable property records	12
	Statutory records	2/12
Sales and marketing division	Product/service information and materials	1/3
	Policy and premium details	1/3
	Product sales records	12
	Marketing and future product/plan strategies	12/13
	Client information and database	9/13
	Third party agreements and documents	8/4
	User agreements and history in relation to the use of King Price's products and services	2/3/4
	Client information and history	2/4
Information technology division	Processing, administrative and development records	12/13

King Price record classification key

Classification no.	Access	Classification (PAIA section)
1	May be disclosed	Public access document
2	May not be disclosed	Request after commencement of criminal or civil proceedings (s7)
3	May be disclosed	Subject to copyright
4	Limited disclosure	Personal information of natural persons that belongs to the requester of that information, or personal information of juristic persons represented by the requester of that information (s61)
5	May not be disclosed	Unreasonable disclosure of personal information or of natural person (s63)
6	May not be disclosed	Likely to harm the commercial or financial interests of a third party (s64(1)(a) and (b))
7	May not be disclosed	Likely to harm the company or third party in contract or other negotiations (s64(1)(c))
8	May not be disclosed	Would breach a duty of confidence owed to a third party in terms of an agreement (s65)
9	May not be disclosed	Likely to compromise the safety of individuals or protection of property (s66)
10	May not be disclosed	Legally privileged document (s67)
11	May not be refused	Environmental testing/investigation which reveals public safety/environmental risks (s64(2); s68(2))
12	May not be disclosed	Commercial information of private body (s68)
13	May not be disclosed	Likely to prejudice research and development information of the company or a third party (s69)
14	May not be refused	Disclosure in public interest (s70)

Processing of personal information

Pursuant to promoting responsible information processing practices within its organisation, as well as in its capacity as responsible party contemplated in terms of the provisions of POPIA, King Price takes any activities relating to the protection and processing of personal information (as defined in terms of the provisions of Section 1 of POPIA) very seriously. To promote the data subjects' constitutional right to privacy, as well as to play its part in promoting the rights protected in terms of POPIA, King Price undertakes to, in so far as is required of it, observe the requirements and conditions for the lawful processing of personal information.

The purposes for which King Price processes personal information

King Price may process personal information for a variety of purposes, which may include, but isn't limited to, the following:

- To provide or manage any information, products, or services requested by data subjects.
- To establish a data subject's needs, wants and preferences in relation to the products/services provided by King Price.
- To identify a data subject's risk profile and make an election as to whether King Price wishes to enter into a contractual relationship with the data subject and if so, on what terms.
- To help King Price identify data subjects when they contact King Price.
- To facilitate the delivery of products/services to clients.
- To administer claims and client premiums.
- To activate policies.
- To allocate unique identifiers to clients for the purpose of securely storing, retaining and recalling such member's personal information/personal data from time to time.
- To maintain records of data subjects and specifically client records.
- To maintain third party records.
- For recruitment purposes.
- For employment purposes.
- For apprenticeship purposes.

- For general administration purposes.
- For legal/contractual purposes.
- For health and safety purposes.
- To retain the records of brokers.
- To monitor access, secure and manage any facilities owned or operated by King Price regardless of location in South Africa.
- To transact with third parties.
- To improve the quality of King Price's products and services.
- To detect and prevent money laundering.
- To analyse the personal information/personal data collected for research and statistical purposes.
- To enable underwriting management agencies (UMAs) to process claims and discharge any functions specified in a binder agreement.
- To help recover bad debts.
- To transfer personal information/personal data across the borders of South Africa to other jurisdictions.
- To carry out analysis and client profiling.
- To identify other products and services which might be of interest to our clients and data subjects in general, as well as to inform them of such products/services.
- To obtain and share information about a data subject's credit-worthiness and risk profile with any credit bureau or credit provider's industry association or industry body, which includes information pertaining to a data subject's credit history, claims history, financial history, judgements, default history and sharing information for purposes of risk analysis, tracing and related purposes.

Categories of data subjects and personal information processed by King Price

The categories of data subjects and personal information processed by King Price may include, but isn't limited to, the following:

Clients and potential clients	Clients and potential clients' personal information
	Clients and potential clients' financial information
	Clients' special personal information
Suppliers, partners, and service providers	Suppliers, partners, and service providers' personal information
	Suppliers, partners, and service providers' special personal information
Employees	Employees' personal information
	Employees' special personal information

Recipients or categories of recipients with whom personal information is shared

Subject to any relevant terms and conditions of use which may be applicable when a data subject engages with King Price, we may share the personal information of any data subject we process for any of the purposes outlined in this manual, with the following third parties, whether such third parties qualify as 'responsible parties' in terms of Section 1 of POPIA or not:

- Any associated company of King Price.
- Any relevant service providers.
- Any consultant or advisor to King Price.
- Any relevant regulatory authorities who may govern King Price in undertaking its operations or business.
- Any approved service provider, contractor or supplier with whom King Price has an agreement.
- UMAs.
- Any approved business partners who provide products and services to King Price.
- Any approved service providers or authorised agents who perform services on King Price's behalf.

King Price processes personal information in order to facilitate and enhance the delivery of products and services to its clients, foster a legally compliant workplace environment, as well as safeguard the personal information relating to any data subjects which it in fact holds. We undertake to process any personal information in a manner which promotes the constitutional right to privacy, retains accountability and data subject participation.

Information security measures to protect personal information

We have, and continue to, implement reasonable, technical and organisational measures for the protection of personal information processed by King Price. We at all times take reasonable and appropriate security measures to secure the integrity and confidentiality of personal information in our possession in order to guard against:

- The loss of, damage to, or unauthorised destruction of, personal information.
- The unlawful access or processing of personal information.
- The wilful manipulation of personal information.

We'll take steps to ensure that any third party process operators (as defined in terms of Section 1 of POPIA) who process personal information on behalf of King Price apply adequate safeguards as outlined above.

Trans-border flows of personal information

King Price will only transfer personal information across South African borders if the relevant business transactions or situation requires trans-border processing, and will do so only in accordance with South African legislative requirements or if the relevant data subject consents to the transfer of their personal information to third parties in any foreign jurisdictions.

We'll take reasonable steps to ensure that any third party process operators are bound by laws, binding corporate rules or binding agreements that provide an adequate level of protection and uphold the principles for reasonable and lawful processing of personal information as contemplated in terms of POPIA.

Personal information received from third parties

When King Price receives personal information from any third party on behalf of a data subject, we require confirmation that such a third party has written consent from the data subject, that they're aware of the contents of this PAIA manual and the King Price privacy policy, and don't have any objection to our processing their personal information accordingly.

Prescribed request forms and fees

How to gain access to records not automatically disclosed

Information which is automatically available, without having to complete the prescribed form A and pay the requester's fee, will be made available at the offices of King Price or in the manner requested, should this be reasonable and possible. The manner of access will include:

- Perusal with copying of material if needed and at the prescribed fee for copies.
- Access to visual, or audio-visual material with a transcription, dubbing, copying or both, if required.

To facilitate the processing of any request by a requester, kindly follow the procedure set forth herein below:

- Use the prescribed form A attached hereto as Annexure A, alternatively found on King Price's website kingprice.co.za
- Address your request to the information officer.
- Provide sufficient detail to enable King Price or any authorised person dealing with a request to identify:
 - The record/s requested.
 - The requester (and, if an agent is lodging the request on behalf of someone, proof of capacity and authorisation).
 - The South African postal address, email address or fax number of the requester.
 - The form of access required.
 - If the requester wishes to be informed of the decision in any manner (in addition to being informed in writing) the manner and particulars thereof.
 - The right which the requester is seeking to exercise or protect with an explanation of the reason the record is required in order to exercise or protect the right.

Prescribed fees

The following applies to requests (other than personal requests):

- A requester is required to pay the prescribed fees (R50) before a request will be processed.
- If the preparation of the record requested requires more than the prescribed hours, a deposit will be paid (of not more than 1 third of the access fee which would be payable if the request were granted).
- A requester may lodge an application with a court against the tender/payment of the request fee/deposit.
- Records may be withheld until the fees have been paid.

The detailed fee structure as prescribed in terms of Section 54 of the PAIA Act is attached hereto as Annexure B and is also available on King Price's website kingprice.co.za

Access to prescribed forms and fees

Prescribed forms can be requested from the information officer or deputy information officer.

Remedies

King Price doesn't have an internal appeal procedure regarding the PAIA and POPIA requests for access to information. As such, the decision made by the duly authorised persons, is final.

If a request is denied, the requester is entitled to apply to a court with appropriate jurisdiction, or the Information Regulator (once established), for relief.

Annexure A

Request for access to record of private body

Section 53(1) of the PAIA Act No. 2 of 2000

Regulation 10

A. Particulars of private body

King Price Insurance Company Limited	
FSP no.	43862
Reg no.	2009/012496/06
Physical address	Menlyn Corporate Park, Block A, Cnr Garsfontein and Corobay Avenue, Waterkloof Glen X11, Pretoria, 0181
Postal address	PO Box 284, Menlyn, Pretoria, Gauteng, 0063
Online	kingprice.co.za

B. Particulars of person requesting access to the record

Name			
ID no.			
Postal address			
		Code	
Phone no.		Fax no.	
Email			
Capacity in which request is made, when made on behalf of another person			

C. Particulars of person on whose behalf request is made

This section must only be completed if a request for information is being made on behalf of another person.

Name	
ID no.	

D. Particulars of record

The requester must provide full particulars of the record to which access is requested, including any reference number if that's known to the requester, to enable the record to be located. You're welcome to attach an annexure (which must be signed) to this request form if the space provided is insufficient.

Description of record or relevant part of the record	
Ref no. (if available)	
Any further particulars of record	

E. Fees

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. King Price will, upon receipt of your request, notify you of the amount required to be paid as the request fee. 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. If you qualify for exemption of the payment of any fee, please state the reason for exemption.

F. Form of access to record

If you're prevented by a disability from reading, viewing or listening 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	
Tick the appropriate boxes <ul style="list-style-type: none"> • Compliance with your request in the specified form may depend on the form in which the record is available • Access in the form requested may be refused in certain circumstances (in such a case you'll be informed if access will be granted in another form) • 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	
Copy of record	Inspection of record
2. If record consists of visual images	
This includes photographs, slides, video recordings, computer-generated images, sketches, etc.	
View the images	Copy of the images Transcription of the images
3. If record consists of recorded words or information which can be reproduced in sound	
Listen to the soundtrack (audio cassette)	Transcription of soundtrack (written or printed document)
4. If record is held on computer or in an electronic or machine-readable form	
Printed copy of record	Printed copy of information derived from the record
Copy in computer readable form (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 (postage will be payable by you)	Yes No

G. Particulars of right to be exercised or protected

You're welcome to attach an annexure (which must be signed) to this request form if the space provided is insufficient.

Indicate which right is to be exercised or protected	
Explain why the record requested is required for the exercise or protection of the aforementioned right	

H. Notice of decision regarding request for access

You'll be notified in writing whether your request has been approved/denied. If you wish to be informed in another manner, please specify the manner and provide the necessary particulars to enable the compliance department to action 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 ____ .

Requester/person on whose behalf request is made's signature

Annexure B

Prescribed fee tariff

General

The following applies to requests (other than personal requests):

- A requester is required to pay the prescribed fee (R50) before a request will be processed.
- If the preparation of the record requested requires more than the prescribed hours determined by King Price's information officer, a deposit must be paid by the person requesting the document (of not more than 1 third of the access fee which would be payable if the request were granted).
- A requester may lodge an application with a court against the tender/payment of the request fee/deposit.
- Records may be withheld until the fees have been paid. Payments should be made to the business account of King Price, the particulars of which account details will be made available to a requester upon lodging a request for access to information.

Fees in respect of private bodies such as King Price

- The fee for a copy of the manual as contemplated in regulation 9(2)(c) is R1.10 for every photocopy of an A4-size page or part thereof.
- The fees for reproduction referred to in regulation 11(1) are as follows:

For every photocopy of an A4-size page or part thereof	R1.10
For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	R0.75
For a copy in a computer-readable form on a compact disc	R70
For a transcription of visual images, for an A4-size page or part thereof	R40
For a copy of visual images	R60
For a transcription of an audio record, for an A4-size page or part thereof	R20
For a copy of an audio record	R30

- The request fee payable by a requester, other than a personal requester, referred to in regulation 11(2) is R50.
- The access fees payable by a requester referred to in regulation 11(3) are as follows:

For every photocopy of an A4-size page or part thereof	R1.10
For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	R0.75
For a copy in a computer-readable form on a compact disc	R70
For a transcription of visual images, for an A4-size page or part thereof	R40
For a copy of visual images	R60
For a transcription of an audio record, for an A4-size page or part thereof	R20
For a copy of an audio record	R30

- To search for and prepare the record for disclosure: R30 for each hour or part of an hour reasonably required for such search and preparation.
- For purposes of Section 54(2) of the Act, the following applies:
 - 1 hour as the hours to be exceeded before a deposit is payable.
 - 1 third of the access fee is payable as a deposit by the requester.
- Postage fees are payable (by the requester) when a copy of a record must be posted to a requester.