

PAIA MANUAL

Version 4 – xxx2026

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1. INTRODUCTION

The Promotion of Access to Information Act, 2000 (“PAIA”) gives effect to the constitutional right of access to information held by public and private bodies, as provided for in section 32 of the Constitution of the Republic of South Africa. PAIA aims to foster a culture of transparency and accountability in both public and private sector organisations by establishing clear procedures that enable individuals to request and obtain information required for the exercise or protection of their rights.

As a private body operating within the Republic, CIB (Pty) Ltd (“CIB”) is required in terms of section 51 of PAIA to prepare, maintain, and make available a PAIA Manual. This Manual serves as a guide to members of the public by explaining what records CIB holds, which of those records may be accessed without a formal PAIA request, the process to follow when submitting a request for access, the applicable fees, and the rights and remedies available when access is denied.

Following the commencement of the Protection of Personal Information Act, 2013 (“POPIA”), private bodies must now also include certain mandatory information in their PAIA Manuals relating to the processing of personal information. This includes the purposes for which personal information is processed, categories of data subjects, categories of recipients, transborder data flows, and a general description of security measures used to safeguard information.

This Manual therefore integrates both PAIA and POPIA requirements to provide a comprehensive overview of CIB’s information governance environment. It informs the public of their right to access information, the circumstances under which access may be granted or refused, and the procedures for lodging complaints with the Information Regulator. Furthermore, it outlines the roles and responsibilities of CIB’s Information Officer and Deputy Information Officer, who are designated in accordance with PAIA and POPIA and registered with the Information Regulator.

CIB is committed to promoting a culture of openness, lawful processing of personal information, and responsible information management. This Manual is reviewed annually and updated where necessary to ensure ongoing compliance with legislative requirements and regulatory guidance.

2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

- check the categories of records held by a body which are available without a person having to submit a formal PAIA request.
- have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject.
- know the description of the records of the body which are available in accordance with any other legislation.
- access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access.
- know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it.

- know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto.
- know the description of the categories of data subjects and of the information or categories of information relating thereto.
- know the recipients or categories of recipients to whom the personal information may be supplied.
- know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3. SCOPE

This manual applies to:

- All employees, directors, key individuals, representatives and officers
- All contractors, consultants, temporary workers and third-party service providers
- All business units, functions, systems and activities
- All outsourced activities performed on behalf of CIB
- All binder, intermediary and UMA-related activities

4. LIST OF ACRONYMS AND ABBREVIATIONS

- | | |
|---------------|--|
| • “CEO” | Chief Executive Officer |
| • “DIO” | Deputy Information Officer. |
| • “IO “ | Information Officer. |
| • “Minister” | Minister of Justice and Correctional Services. |
| • “PAIA” | Promotion of Access to Information Act No. 2 of 2000(as Amended. |
| • “POPIA” | Protection of Personal Information Act No.4 of 2013. |
| • “Regulator” | Information Regulator; and |
| • “Republic” | Republic of South Africa |

5. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF CIB PTY LTD

- Chief Information Officer
 - Name: Douglas Donnelly
 - Tel: 011-455-5101
 - Email: compliance@cib.co.za

- **Deputy Information Officer**

Name: Cherece Donnelly- Keil
Tel: 011-455-5101
Email: compliance@cib.co.za

- **Access to information general contacts**

Email: compliance@cib.co.za
Website: www.cib.co.za

- **National or Head Office**

Postal Address: Private Bag x1600, Bedfordview, 2008
Physical Address: 15E Riley Road, Riley Road Office Park, Bedfordview 2008
Telephone: 011-455-5101
Email: compliance@cib.co.za

6. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

The Information Regulator has published a **Guide on how to use PAIA** (and exercise POPIA data-subject rights) in terms of section 10(1). It is available in **official languages** and in accessible formats; members of the public can obtain it from the Regulator's website or by request.

- The website of the Regulator (<https://www.justice.gov.za/infoereg/>).

7. RECORDS AVAILABLE WITHOUT A FORMAL PAIA REQUEST (SECTION 52)

- Company profile
- Marketing brochures
- Website information
- Published annual reports
- Service descriptions

8. CATEGORIES OF RECORDS OF CIB PTY LTD WHICH ARE AVAILABLE THROUGH AN ACCESS REQUEST

1. **Company Act records**

- Memorandum of Incorporation - Automatically available from CIPC
- Documents of Incorporation - Automatically available from CIPC
- Directors' names - Automatically available from CIPC
- Minutes of meeting of the Board of Directors - Not automatically available

- All trust deeds - Not automatically available
- Minutes of meetings of Shareholders - Not automatically available
- Records relating to the appointment of:
 - Auditors.
 - Directors.
 - Prescribed Officer.
 - Public Officer; and
 - Secretary

Not automatically available

- Share certificates, Share Register, and other statutory registers and/or records and/or documents - Not automatically available
- Other statutory records - Not automatically available

2. Business records

- Operational records - Not automatically available
- Databases - Not automatically available
- Internal correspondence - Not automatically available
- Product records - Not automatically available

3. Financial records

- Financial statements - Not automatically available (CIB will require a non-disclosure agreement)
- Tax returns - Not automatically available
- Other documentation relating to taxation of the company - Not automatically available
- Accounting Records - Not automatically available
- Banking records - Not automatically available
- Banking details - Automatically available on request
- Bank statements - Not automatically available
- Electronic Bank records - Not automatically available
- Paid cheques - Not automatically available
- Asset register - Not automatically available
- Rental agreements - Not automatically available
- Invoices - Not automatically available
- Financial agreements - Not automatically available

4. Insurance records

- Customer details - Not automatically available
- Insurance proposals/quotations - Not automatically available

- Information and records provided by a third party/intermediary - Not automatically available

5. Income tax records

- PAYE Records - Not automatically available
- Corporate Tax records - Not automatically available
- Documents issued to employees for income tax purposes - Not automatically available
- Records of payments made to SARS on behalf of employees - Not automatically available
- VAT records - Not automatically available
- Skills development levies - Not automatically available
- UIF - Not automatically available
- Workmen's Compensation - Not automatically available

6. Personal records

- List of employees - Not automatically available
- Employee personal information - Not automatically available
- Employee employment contracts - Not automatically available
- Employment policies and procedures - Not automatically available
- Employment Equity Plan - Not automatically available
- Salaries of employees - Not automatically available
- Leave records - Not automatically available
- Internal evaluations - Not automatically available
- Disciplinary records - Not automatically available
- Disciplinary codes - Not automatically available
- Training records - Not automatically available
- Operating manuals - Not automatically available
- Personal records provided by personnel - Not automatically available
- Other statutory records - Not automatically available
- Related correspondence - Not automatically available

7. Policies and directives

- Internal relating to employees and the company - Not automatically available
- External relating to clients and other third parties - Not automatically available

8. Agreements or contracts

- Standard Agreements - Not automatically available
- Contracts concluded with brokers - Not automatically available
- Letters of Intent, MOUs - Not automatically available

- Office management contracts - Not automatically available
- Third party contracts (such as JV agreements, etc.) - Not automatically available
- Supplier contracts

9. Regulatory documents

- Permits - Not automatically available
- Licences - Not automatically available
- Authorities - Not automatically available

10. Published information

- External newsletters and circulars - Not automatically available
- Internal newsletters and circulars - Not automatically available
- Information on the company published by third parties - Not automatically available

11. Client information

- Client details - Not automatically available
- Contact details of individuals within clients - Not automatically available
- Communications with clients - Not automatically available
- Business production records - Not automatically available
- Transactional information - Not automatically available
- Marketing records - Not automatically available

9. DESCRIPTION OF THE RECORDS OF CIB PTY LTD WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

1. Companies Act 71 of 2008 and other applicable legislation

- Memorandum of Incorporation (MOI)
 - Annual General Meeting Reports
 - Annual financial statements
 - Accounting Records
- Notice and minutes of all shareholder meetings

2. Promotion of Access to Information Act 2 of 2000

- PAIA Manual

3. Basic Conditions of Employment Act No. 53 of 2003

- Employee Records

4. Broad-Based Black Economic Empowerment Act 53 of 2003

- B-BBEE Records

5. Compensation for Occupational Injuries and Health Diseases Act No. 130 of 1993

- Accident Records

6. Competition Act No. 89 of 1998

- List of Shareholders and their respective shareholding
- Procurement records

7. Consumer Affairs (Unfair Business Practice) Act No. 71 of 1988

- Advertising and promotional material
- Records related to the transactions

8. Electronic Communications Act No.36 of 2005

- Contractual agreements

9. Employment Equity Act No. 55 of 1998

- Employment Equity Plan

10. Financial Advisory and Intermediary Services Act No. 37 of 2002

- License
- Representative and Key Individual Registers
- Debarments
- Accounting and Auditing Records
- Profile changes

11. Financial Intelligence Centre Act No. 38 of 2001

- Cash transactions in excess of R 49 999.
- Transactions and activities by clients that appear suspicious or unusual.
- Any suspicion that client may possess or control property that is linked to terrorism
- Staff screening

12. Financial Sector Regulation Act No. 9 of 2017

- Full and proper accounting records
- Annual financial statements
- Profile changes
- Representative Register (and all related documentation CPD Certificates, Section 13 letters etc.)

Contraventions with applicable laws

13. Income Tax Act No. 58 of 1962

- PAYE Records
- Documents issued to employees for income tax purposes.
- Records of payments made to SARS on behalf of employees.
- All other statutory compliances:
 - VAT
 - Regional Services Levies
 - Skills Development Levies
 - UIF
 - Workmen's Compensation

14. Insurance Act No. 18 of 2017

- Licence
- Governance Framework
- Financial statements
- Information relating to the appointment of key persons
- Information relating to the ownership and control of company
- Shareholding
- Client/policy related information

14. Intellectual Property Law Amendment Act no. 38 of 2017

- Advertising and promotional material
- Company materials (i.e. such as letterheads, business cards etc) as well dates of first use

15. Labour Relations Act No. 66 of 1995

- Disciplinary Code and Records
- Employee benefits arrangements rules and records
- Employment Contracts
- Employment Equity Plan
- Forms and Applications
- Grievance Procedures
- Leave Records
- Medical Aid Records
- Payroll reports/ Wage register
- Pension Fund Records

- Safety, Health and Environmental records
- Salary Records
- SETA records
- Standard letters and notices
- Training Manuals
- Training Records
- Workplace and Union agreements and records

16. Occupational Health and Safety Act No. 85 of 1993

- Complete Safety, Health, and Environment Risk Assessment
- Environmental Managements Plans
- Inquiries, inspections, examinations by environmental authorities

17. Pensions Funds Act No. 24 of 1956

- Employment Contracts
- Employees' contributions

18. Prevention and Combating of Corrupt Activities Act No. 12 of 2004

- Records of transactions

19. Promotion of Access to Information Act No. 2 of 2000

- PAIA Manual and Guide
- PAIA Reporting (where applicable)
- Subject Access requests

20. Promotion of Equality and Prevention of Unfair Discrimination Act No. 4 of 2020

- Information related to the provision of benefits, facilities and services related to insurance.

21. Protected Disclosures Act No. 26 of 2000

- Whistle Blowing Policy

22. Protection of Personal Information Act No. 4 of 2013

- POPIA Policy
- PAIA Manual and Guide

23. Skills Development Act 97 of 1998

- Learnership Agreements/ Employment Contract
- Learnership/employment records

24. South African Reserve Bank Act No. 90 of 1989

- Records, books of accounts or documents.
- Monthly Employer Declaration (EMP 201)

25. Unemployment Insurance Act No. 63 of 2001

- Employment Contracts
- Employees' contributions

26. Unemployment Insurance Contributions Act No 4 of 2002

- Employment Contracts
- Employees' contributions

27. Value Added Tax Act No 89 of 1991

- VAT Returns
- VAT Statements

10. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY CIB PTY LTD

1. Company Act records

- Memorandum of Incorporation - Automatically available from CIPC
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 - Employment Equity Plan - Not automatically available
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 - Leave records - Not automatically available
 - Internal evaluations - Not automatically available
 - Disciplinary records - Not automatically available
 - Disciplinary codes - Not automatically available
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 - Operating manuals - Not automatically available
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11. PROCESSING OF PERSONAL INFORMATION

11.1. Purpose of Processing Personal Information

- To support sales and marketing activities
- To underwrite non-life insurance policies
- To settle claims under non-life insurance policies
- To support the engagement with intermediaries
- To support recruitment and management of staff
- To support engagement with suppliers
- To support engagement with the public

11.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

Categories of Data Subjects	Personal Information that may be processed
Customers / Clients	Record of customer life cycle
Service Providers	Record of supplier life cycle
Employees	Record of employee life cycle
General public	Tracking general enquires and web site visits
Investors	Records as maintained by CFO
Media	Record of media interactions

11.3 The recipients or categories of recipients to whom the personal information may be supplied

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Identity number and names, for criminal checks	South African Police Services
Qualifications, for qualification verifications	South African Qualifications Authority

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Credit and payment history, for credit information	Credit Bureaus
Customer/member information, visitor information, employee Information	Service Providers
Returns e.g. Employment Equity returns	Statutory authorities
Income tax information	Tax Authorities
Financials information relating to CIB's business	Financial institutions

11.4 Planned transborder flows of personal information

- Flows service providers /operators /reinsurers

11.5 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity, and availability of the information

- Physical security measures
- Cyber security measures
- Training in information security
- Policies in information security
- Audit of information security
- Any particular security framework implemented

12. DETAIL ON HOW TO MAKE A REQUEST FOR ACCESS

1. PAIA FORM 02: REQUEST FOR ACCESS TO RECORD OF RELEVANT BODY/BODIES

In terms of Section 53 (1) of the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000) [Regulation (7), Form 02 should be used to request access to a record held by a relevant body/body in terms of PAIA. Form 02 can be downloaded from the Information Regulator website under Documents/Forms. It can also be downloaded using the link below.

[PAIA REQUEST FORM 2 - Search](#)

2. POPIA FORM 2: REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION IN TERMS OF SECTION 24 (1) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)

In terms of the Protection of Personal Information Act of 2013, Section 24 and the Regulations relating to the Protection of Personal information, 2017, [Regulation 3(2)] Form 2 should be used to raise requests for the correction or deletion of personal information or destroying or deletion of record of personal information. Form 2 is available on the Information Regulator website under Documents/Forms. It can be downloaded using the link below:

<https://inforegulator.org.za/wp-content/uploads/2020/07/FORM-2-REQUEST-FOR-CORRECTION-OR-DELETION-OF-PERSONAL-INFORMATION-OR.pdf>

13. AVAILABILITY OF THE MANUAL

- A copy of the Manual is available- On www.cib.co.za
 - CIB Pty Ltd office 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.
- A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

14. UPDATING OF THE MANUAL

The Compliance Department of CIB Pty Ltd will on a regular basis update this manual.

15. GRANTING OF REQUEST

- The Information Officer will, within 30 calendar days, after receipt of the request, decide whether to grant or decline the request and give notice with reason (if required) to that effect.
- The 30-calendar day period noted above, may be extended for a further period of not more than 30 days if the request is for a large number of information, or the request requires a search for information and the information cannot be obtained within the initial 30 (thirty) day period. Should an extension of time be required, a notification will be provided to the requester.
- If we cannot find any requested record or it does not exist, then we will notify you by way of affidavit that it is not possible to give access to that particular record.

16. THIRD PARTY INFORMATION

If the request for access to information affects a third party, then such a third party must first be informed within 21 (twenty-one) days of receipt of the request. The third party would then have a further 21 (twenty-one) days to make representations and/or submissions regarding the granting of access to the record.

17. GROUND FOR REFUSAL

The Information Officer will refuse access to a record in accordance with one of the prescribed grounds in terms of the Act. These grounds include:

- The protection of the privacy of a third party who is a natural person, which would involve the unreasonable disclosure of PI of that natural person.
- The protection of the commercial information of a third party, if the record contains:
 - Trade secrets of that third party.
 - Financial, commercial, scientific, or technical information which if disclosed could likely cause harm to the financial or commercial interests of that third party; or
 - Information disclosed in confidence by a third party to the group, if the disclosure could put that third party at a disadvantage in negotiations or commercial competition.
- The protection of confidential information of third parties if disclosing such would or could constitute a breach of the duty of confidence owed to a third party in terms of any agreement.
- The protection of the safety of individuals and the protection of property.
- The protection of records which would be regarded as privileged in legal proceedings.
- The protection of the commercial activities of CIB Pty Ltd, which may include –
 - Trade secrets.
 - Financial, commercial, scientific, or technical information which disclosure could likely cause harm to the financial or commercial interests of CIB Pty Ltd; or
 - Information which, if disclosed, could put CIB Pty Ltd at a disadvantage in negotiations or commercial competition.
 - A computer program owned by CIB Pty Ltd, and which is protected by copyright.
- The protection of research information of the group or a third party, if its disclosure would disclose or reveal the identity of the group, the researcher or the subject matter of the research and would place the research at a serious disadvantage.

18. PRESCRIBED FEES

- PAIA provides for two types of fees, namely:
 - a request fee, which will be a standard fee; and
 - an access fee, which must be calculated by considering reproduction costs, search and preparation time and cost, as well as postal costs
- A requester is required to pay the prescribed fees before a request is processed.
- The prescribed fees are as set out in the Fee Schedule which is available from the Information Regulator (South Africa).

Issued by

Nileen Seejiram

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Human Resources Executive