PAIA MANUAL

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

DATE OF COMPILATION: 29/06/2026
DATE OF REVISION: 29/06/2027

1. LIST OF ACRONYMS AND ABBREVIATIONS

1.1 **"CEO"** Chief Executive Officer

1.2 **"DIO"** Deputy Information Officer;

1.3 **"IO"** Information Officer;

1.4 **"Minister"** Minister of Justice and Correctional Services;

1.5 **"PAIA"** Promotion of Access to Information Act No. 2 of 2000(as Amended;

1.6 **"POPIA"** Protection of Personal Information Act No.4 of 2013;

1.7 **"Regulator"** Information Regulator; and

1.8 **"Republic"** Republic of South Africa

2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

2.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;

2.2 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;

2.3 know the description of the records of the body which are available in accordance with any other legislation;

2.4 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;

2.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;

2.6 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;

2.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;

2.8 know the recipients or categories of recipients to whom the personal information may be supplied;

2.9 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

2.10 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. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF PLATFORM INSURANCE BROKERS (PTY) LTD

a. Chief Information Officer

Name: Jonathan Lang

Tel: 082 899 3358

Email: Jonathan@platformib.co.za

3.2 Deputy Information Officer

Name: Danica Lang

Tel: 082 909 6245

Email: Danica@platformib.co.za

3.3 Access to information general contacts

Email: Danica@platformib.co.za

3.4 National or Head Office

Postal Address:

397 Cork Avenue, Unit 3 Les Fourgeres, Ferndale, 2194

Physical Address: 397 Cork Avenue, Unit 3 Les Fourgeres, Ferndale, 2194

Telephone: 082 899 3358

Email: Jonathan@platformib.co.za

Website: www.platformib.co.za

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

a. The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the 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.

b. The Guide is available in each of the official languages and in braille.

c. The aforesaid Guide contains the description of-

i. the objects of PAIA and POPIA;

ii. the postal and street address, phone and fax number and, if available, electronic mail address of-

1. the Information Officer of every public body, and

2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA[1] and section 56 of POPIA[2];

iii. the manner and form of a request for-

1. access to a record of a public body contemplated in section 11[3]; and

2. access to a record of a private body contemplated in section 50[4];

iv. the assistance available from the IO of a public body in terms of PAIA and POPIA;

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

vi. 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, including the manner of lodging-

1. an internal appeal;

2. a complaint to the Regulator; and

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[1] Section 17(1) of PAIA- *For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.*

[2] *Section 56(a) of POPIA- Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.*

[3] *Section 11(1) of PAIA- A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

[4] *Section 50(1) of PAIA- A requester must be given access to any record of a private body if-*

a) that record is required for the exercise or protection of any rights;

b) that person complies with the procedural requirements in PAIA relating to a request for access to that record; and

c) access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

3. an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;

vii. the provisions of sections 14[5] and 51[6] requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;

viii. the provisions of sections 15[7] and 52[8] providing for the voluntary disclosure of categories of records by a public body and private body, respectively;

ix. the notices issued in terms of sections 22[9] and 54[10] regarding fees to be paid in relation to requests for access; and

x. the regulations made in terms of section 92[11].

d. 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.

e. The Guide can also be obtained-

i. upon request to the Information Officer;

ii. from the website of the Regulator (https://www.justice.gov.za/inforeg/).

4.6 A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours-

4.6.1 English / Afrikaans

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[5] *Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.*

[6] *Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.*

[7] *Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access*

[8] *Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access*

[9] *Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.*

[10] *Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.*

[11] *Section 92(1) of PAIA provides that –"The Minister may, by notice in the Gazette, make regulations regarding-*

(a) any matter which is required or permitted by this Act to be prescribed;
(b) any matter relating to the fees contemplated in sections 22 and 54;
(c) any notice required by this Act;
(d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and
(e) any administrative or procedural matter necessary to give effect to the provisions of this Act."

5. CATEGORIES OF RECORDS OF PLATFORM INSURANCE BROKERS (PTY) LTD WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Category of records	**Types of the Record**	Available on Website	Available upon request
Company Information	Company profile and contact details	X	X
Regulatory Information	FSP licence number, authorised financial services, key individuals and representatives		X
PAIA Manual	Current PAIA Manual	X	X
Privacy Documentation	Privacy Notice / POPIA Privacy Policy	X	X
Complaints Process	Complaints Resolution Procedure	X	X
Treating Customers Fairly (TCF)	TCF Policy or TCF Statement		X
FAIS Disclosure	General FAIS disclosure documentation		X
Product Information	Product brochures supplied by insurers		X
Application Forms	General quotation or contact forms		X

6. DESCRIPTION OF THE RECORDS OF PLATFORM INSURANCE BROKERS WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Category of Records	**Applicable Legislation**
Memorandum of incorporation	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000
Annual Financial Statements	Companies Act 71 of 2008
Accounting Records	Companies Act 71 of 2008; Income Tax Act 58 of 1962
Tax Records (VAT, PAYE, UIF, SDL)	Income Tax Act 58 of 1962; Value-Added Tax Act 89 of 1991; Tax Administration Act 28 of 2011
Financial Services Records	Financial Advisory and Intermediary Services Act 37 of 2002 (FAIS)
Representative Register	FAIS Act 37 of 2002
Fit and Proper Compliance Records	FAIS Act 37 of 2002
Client Advice Records / Record of Advice	FAIS Act 37 of 2002; General Code of Conduct
Complaints Register	FAIS Act 37 of 2002; General Code of Conduct
Compliance Monitoring Records	FAIS Act 37 of 2002
Risk Management and Compliance Programme (RMCP)	Financial Intelligence Centre Act 38 of 2001
POPIA Records	Protection of Personal Information Act 4 of 2013

7. **DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY PLATFORM INSURANCE BROKERS**

Subjects on which the body holds records	**Categories of records**
Corporate Governance	Memorandum of Incorporation, CIPC records, shareholder records, director resolutions, board minutes, statutory registers.
Financial Management	Annual financial statements, accounting records, invoices, bank statements, budgets, tax records, audit reports and supporting financial documentation.
Human Resources	Employment contracts, personnel files, payroll records, leave records, disciplinary records, performance appraisals, training records and HR policies.
Compliance and Risk Management	Risk Management and Compliance Programme (RMCP), Compliance Monitoring Plan, compliance reports, compliance registers, breach registers.
FAIS Compliance	Representative register, Key Individual records, Fit and Proper records, Continuous Professional Development (CPD) records, supervision records, appointment and debarment records, conflict of interest management records, regulatory reporting.
FICA Compliance	Customer Due Diligence (CDD) records, Know Your Client (KYC) documentation, beneficial ownership records, Risk Rating records, Targeted Financial Sanctions (TFS) screening records, sanctions registers, suspicious and unusual transaction reporting records, FICA training records.
Client Administration	Client application forms, mandates, client identification documents, policy schedules, policy amendments, client correspondence and supporting documentation.
Advice and Intermediary Services	Records of Advice (ROA), needs analyses, disclosure documents, quotations, product comparisons, replacement advice records and policy recommendations.
Complaints Management	Complaints register, complaint files, investigation records, correspondence and complaint outcome records.
Information Technology	Electronic records, system access logs, user access records, backup records, cybersecurity policies and disaster recovery documentation.
Legal and Contractual Records	Service level agreements, supplier contracts, legal agreements, legal opinions and litigation records (where applicable).
Marketing and Business Development	Marketing material, website content, advertising records,

Subjects on which the body holds records	Categories of records
	newsletters and client communication templates.
POPIA and PAIA Compliance	PAIA Manual, Privacy Policy, Information Officer records, PAIA requests and responses, POPIA compliance records and records of processing activities.

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

Platform Insurance Brokers (Pty) Ltd processes personal information in order to conduct its business as an authorised Financial Services Provider and to comply with its legal and regulatory obligations. Personal information is processed for the following purposes:

- *To identify and verify clients in accordance with applicable legislation, including the Financial Intelligence Centre Act (FICA).*
- *To assess clients' insurance needs and provide financial advice and intermediary services.*
- *To obtain quotations and arrange insurance cover with insurers and product suppliers.*
- *To administer, maintain and service insurance policies.*
- *To process policy amendments, renewals, cancellations and endorsements.*
- *To facilitate the submission and administration of insurance claims.*
- *To communicate with clients regarding their policies, claims and related services.*
- *To comply with the Financial Advisory and Intermediary Services Act (FAIS), the Financial Intelligence Centre Act (FICA), the Protection of Personal Information Act (POPIA), tax legislation and any other applicable laws.*
- *To maintain records required by legislation and regulatory authorities.*
- *To manage complaints, disputes and legal proceedings.*
- *To administer employment and human resource functions relating to employees.*
- *To manage contractual relationships with insurers, product suppliers, service providers and business partners.*
- *To conduct internal auditing, compliance monitoring, risk management and governance activities.*
- *To protect the legitimate interests of Platform Insurance Brokers (Pty) Ltd, its clients and other stakeholders.*

8.2 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
Clients / Prospective Clients	Full names, identity or passport numbers, date of birth, contact details, residential and postal addresses, marital status, financial information, banking details, tax information, employment details, policy information, claims history, health information (where required for underwriting), FICA documentation, and any other information required to provide financial advice and intermediary services.

Categories of Data Subjects	Personal Information that may be processed
Employees	Personal identification details, contact information, employment history, qualifications, payroll information, banking details, tax information, performance records, leave records, disciplinary records, next of kin details and any information required for employment purposes
Representatives and Key Individuals	Personal identification details, contact information, qualifications, Fit and Proper records, CPD records, RE examination records (where applicable), licensing information, employment records and regulatory compliance records.
Insurers	Contact details of representatives, contractual information, correspondence, service level agreements and business records.
Service Providers	Contact details, company registration details, banking information, tax information, contractual documentation and correspondence.
Complainants	Identification details, contact information, complaint details, supporting documentation, correspondence and investigation records.
Regulatory Authorities and Government Bodies	Personal information submitted or received where required to comply with legal or regulatory obligations.

8.3 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
Credit and payment history, for credit information	Credit Bureaus

8.4 Planned transborder flows of personal information

Platform Insurance Brokers (Pty) Ltd may transfer or store personal information outside the Republic of South Africa where it is necessary for the provision of information technology services, cloud-based storage, email hosting, data backup or other business operations.

Such transfers may include the use of cloud service providers whose servers or backup facilities are located outside South Africa, including but not limited to countries within the European Union, the United Kingdom and the United States of America.

The categories of personal information that may be transferred include client information, employee information, supplier information and business records, to the extent necessary for the relevant service.

Where personal information is transferred outside South Africa, Platform Insurance Brokers (Pty) Ltd will take reasonable steps to ensure that the recipient is subject to laws, binding corporate rules or contractual obligations that provide an adequate level of protection for the personal information, in accordance with section 72 of the Protection of Personal Information Act, 2013.

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

Platform Insurance Brokers (Pty) Ltd implements appropriate, reasonable technical and organisational measures to protect personal information against loss, unauthorised access, disclosure, alteration, destruction or misuse.

These measures include, but are not limited to:

- *Access controls to electronic systems based on user roles and responsibilities.*
- *Password protection and multi-factor authentication (where implemented) for systems containing personal information.*
- *Secure email and cloud-based business systems.*
- *Anti-virus, anti-malware and firewall protection on business devices and networks.*
- *Regular software updates and security patch management.*
- *Secure storage of electronic records with routine system backups.*
- *Physical security measures to protect paper records and business premises, including controlled access to offices and filing systems.*
- *Confidentiality obligations applicable to employees, representatives and service providers who have access to personal information.*
- *Secure disposal or destruction of personal information when it is no longer required and in accordance with applicable legal retention periods.*
- *Staff training and awareness regarding information security, POPIA, FICA and confidentiality obligations.*
- *Ongoing compliance monitoring and periodic review of information security measures to ensure continued effectiveness and compliance with applicable legislation.*

Platform Insurance Brokers (Pty) Ltd continually reviews its information security measures and, where necessary, updates them to address emerging risks and changes in applicable legal and regulatory requirements.

9 AVAILABILITY OF THE MANUAL

9.3 A copy of the Manual is available-

9.3.1 on www.platformib.co.za

9.3.2 head office of Platform Insurance Brokers (Pty) Ltd for public inspection during normal business hours;

9.3.3 to any person upon request and upon the payment of a reasonable prescribed fee; and

9.3.4 to the Information Regulator upon request.

9.4 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.

10. UPDATING OF THE MANUAL

The Key Individuals and Directors of Platform Insurance Brokers will on a regular basis update this manual.

This PAIA Manual is approved by the Key Individuals and Directors of Platform Insurance Brokers (Pty) Ltd and shall remain in force until amended, replaced or withdrawn.

Authorised Financial Services

Provider Platform Insurance

Brokers (Pty) Ltd FSP No.

55019

Version: 2026

Review Date: Annually