



PAIA MANUAL

Rock Solid Brokers (Proprietary) Limited
Company registration number: 2012/086882/07

An authorised financial services provider with FSP number 44234
Hereafter referred to as Rock Solid Brokers

Updated May 2024

Statement Of This Manual

- This manual is part of the internal business processes and procedures for the company that owns it (referred to as the "manual owner").
- The manual applies to everyone working for or with the organization, including the Directors, employees, volunteers, contractors, suppliers, and anyone else acting on the organization's behalf. Everyone covered by this manual should become familiar with its content and follow the outlined processes and procedures.
- People assigned as "risk owners" and "control owners" are responsible for supervising and maintaining the control procedures and activities outlined in this manual.

Manual Adoption

As the Head of the Financial Services Provider Organization, I, Bernard Delport, hereby confirm that the processes outlined in this document are adopted.

Head Signature: _____

Date: _____

About Rock Solid Brokers and This Policy

Rock Solid Brokers acts as an Intermediary, authorised under the Short-Term Insurance Act (No. 53 of 1998) (as amended).

This document outlines our policy regarding personal information, following the guidelines set out in the Protection of Personal Information Act (POPI) No. 4 of 2013.

1. Understanding the Terms

- **Data Subject:** The individual whose personal information is being collected or processed.
- **Deputy Information Officer:** Someone designated by the Information Officer to share some of their responsibilities regarding POPI compliance.
- **Head:** The person with ultimate authority within the organization. This could be an individual owner, a partner in a partnership, or the CEO/equivalent for a legal entity.
- **Information Officer:** The person responsible for overseeing POPI compliance within the organization.
- **Information Regulator:** The government body established to enforce POPI.
- **PAIA:** The Promotion of Access to Information Act (No. 2 of 2000).
- **Person:** This can be an individual or a legal entity (company, trust, etc.).
- **Personal Information:** Any information that can be used to identify a living individual, including details about:
 - Race, gender, sexual orientation, age, disability, religion, etc.
 - Educational background, medical history, financial situation, employment history, etc.
 - Identification numbers, email addresses, phone numbers, location data, etc.
 - Biometric information (fingerprints, etc.)
 - Personal opinions, views, or preferences.
 - Private or confidential correspondence.
 - The opinions of others about the individual.
- **Personal Requester:** Someone who requests access to their own personal information held by our organization.
- **POPI:** The Protection of Personal Information Act (No. 4 of 2013).
- **Private Body:** This refers to any individual, partnership, or legal entity (excluding government bodies) involved in business or professional activities.
- **Processing:** Any activity involving personal information, including collecting, storing, organizing, using, disclosing, or destroying it.
- **Public Body:** Any government department, municipality, or other entity exercising a public power or function.
- **Requester:** Anyone, including a public body, who requests access to records held by our organization.
- **Request for Access:** A formal request for information under Section 50 of PAIA.
- **Record:** Any documented information held by the organization, regardless of format.
- **Third Party:** Anyone other than the requester who might be affected by access to a record.

2. Accessing Information Under PAIA

This section explains how to request access to information held by our organization under the Promotion of Access to Information Act (PAIA) of 2000.

Understanding PAIA

PAIA upholds your right to access information held by public and private entities, as outlined in section 32 of the South African Constitution. This transparency promotes accountability and empowers individuals to exercise their rights effectively.

Our Commitment

We recognise your right to access information and are committed to providing access to our records, as long as the request follows the proper procedures set out by PAIA and the Protection of Personal Information Act (POPI).

PAIA Manual

This manual is compiled according to Section 51 of PAIA and includes the following sections:

- **Annexure A: Contact Details & Business Type:** This section provides our contact information, including our physical address, phone number, fax (if applicable), and email address (if available) for the head of the organization.
- **Annexure B: Section 10 PAIA Guide:** This section explains the guide mentioned in Section 10 of PAIA and how to access it.
- **Annexure C: Statutory Records:** This section lists the laws requiring us to maintain certain records.
- **Annexure D: Availability of Records:** This section provides a list of the records we hold, indicating whether they are freely available or require a formal PAIA request. It also describes the type of data subjects the records pertain to and the purpose for keeping them. Records marked "Freely Available" can be accessed by contacting our Deputy Information Officer (see Annexure A) without a formal request. Records marked "PAIA Request" require a formal request following the procedures in Annexure E.
- **Annexure E: Request Procedure:** This section outlines the steps to follow for requesting access to records marked "PAIA Request" in Annexure D.
- **Annexure F: Prescribed Fees:** This section details any fees associated with processing a request to access our records.
- **Annexure G: Processing of Personal Information:** This section outlines the procedures for handling personal information according to POPI.
- **Annexure H: Deputy Information Officer Appointment:** This section explains the process for formally appointing a Deputy Information Officer, if required.

3. Information Officer Responsibilities and Access Requests

This section outlines the responsibilities of the Information Officer (IO) and/or Deputy Information Officer (DIO) regarding access requests under PAIA.

Information Officer Duties

- **Publishing and Promoting the Manual:** The IO/DIO is responsible for making this PAIA manual publicly available and raising awareness of its contents.
- **Facilitating Access Requests:** The IO/DIO assists requesters with the access request process.
- **Communication and Timeframes:** The IO/DIO keeps requesters informed of the progress of their request and provides timely responses.
- **Granting Access:** The IO/DIO determines whether to grant access to a complete record, part of a record, or deny access altogether. They ensure timely access is provided in the requested format if access is granted.
- **Manual Review and Updates:** The IO/DIO regularly reviews the manual for accuracy and communicates any necessary updates.

Right of Access and Grounds for Refusal

The IO/DIO can only grant access to a record if:

- The record is needed to exercise or protect a right.
- The requester follows the proper procedures.
- No grounds for refusal exist (as outlined below).

Grounds for Refusal

The IO/DIO must assess each request to determine if any grounds for refusal apply. If grounds exist, access will be denied. However, even with grounds for refusal, access may be granted if:

- The record reveals evidence of a serious law violation or imminent public/environmental risk.
- The public interest in disclosure outweighs the harm caused by disclosure.

Partial Disclosure

If a record contains information that justifies refusal, any part of the record that does not contain such information **must** be disclosed, even if a request is denied for the entire record.

Specific Grounds for Refusal

Here's a breakdown of the specific grounds for refusal, categorized by the type of information protected:

A: Mandatory Protection of Privacy of a Third Party who is a Natural Person

Grounds for Refusal:

- Disclosure would involve the unreasonable exposure of personal information about a third party.

Exceptions (No Grounds for Refusal):

- The individual whose information is in the record has provided written consent for its disclosure to you.
- The information is already publicly available.
- The information was provided by the individual with the understanding that it could be made public.
- The record pertains to the physical or mental health, or well-being of a minor under your care (and access is in their best interest).

- The record concerns a deceased individual, and you are their next of kin (or have written consent from next of kin).
- The record contains information about a current or former organization official related to their position (title, work contact information, responsibilities, etc.).

B. Commercial Information of a Third Party:

Grounds for Refusal:

- The record contains:
 - Trade secrets of a third party.
 - Financial, commercial, scientific, or technical information that could harm the third party's commercial or financial interests.
 - Confidential information provided by a third party, where disclosure could disadvantage them in negotiations or competition.

Exceptions (No Grounds for Refusal):

- The third party has provided written consent for disclosure of the information to you.
- The record reveals a serious public safety or environmental risk based on product or environmental testing results (excluding preliminary testing for developing methods).

C. Confidential Information of a Third Party:

Grounds for Refusal:

- Disclosure of the record would violate a confidentiality agreement between Rock Solid Brokers and a third party.

D. Safety of Individuals and Protection of Property:

Grounds for Refusal:

- The record contains information that, if disclosed, could reasonably endanger someone's life or physical safety.
- The record contains information that could likely compromise the security of:
 - Buildings, structures, or systems.
 - Computer or communication systems.
 - Means of transport.
 - Any other property.
- The record contains information that, if disclosed, could likely undermine the security of:
 - Methods or systems for protecting individuals under witness protection schemes.
 - Public safety or the safety of any part of the public.
 - Property security measures.

E. Legal Privilege:

Grounds for Refusal:

- The record contains information that is legally protected from being disclosed in court proceedings. This protection remains in place unless the person entitled to that protection waives it.

F. Commercial Information of the Organization:

Grounds for Refusal:

- The record includes:
 - Rock Solid Brokers' trade secrets.
 - Financial, commercial, scientific, or technical information that could harm Rock Solid Brokers' commercial or financial interests if disclosed.
 - Any information whose disclosure could disadvantage Rock Solid Brokers in negotiations or competition.

- The record is a computer program owned by Rock Solid Brokers as defined by the Copyright Act (Act 98 of 1978), except when providing access to a separate record granted under PAIA.

Exception (No Grounds for Refusal):

- The record reveals a serious public safety or environmental risk based on product or environmental testing results (excluding preliminary testing for developing methods).

G. Research Information

Grounds for Refusal:

- The record contains information about research conducted by or for a third party, where disclosure could significantly disadvantage:
 - The third party.
 - The researcher conducting the research on behalf of the third party.
 - The subject matter of the research itself.
- The record contains information about research conducted by or for Rock Solid Brokers, where disclosure could significantly disadvantage:
 - Rock Solid Brokers.
 - The researcher conducting the research on behalf of Rock Solid Brokers.
 - The subject matter of the research itself.

4. Notice of Request and Decisions

The Information Officer (IO) or Deputy Information Officer (DIO) will notify you upon receiving your access request.

This notice will include:

- Any applicable fees (explained in Annexure F). Personal requesters are exempt from fees.
- Your right to challenge fees or the decision with the Information Regulator or a court. The process for doing so will also be explained.

The IO/DIO will strive to reach a decision within 30 days of receiving your request in the proper format. The decision will be communicated to you, and may include:

- Granting access (with details on fees and access format, and your right to challenge these terms).
- Refusing access (with reasons based on PAIA and excluding any record content. You have the right to challenge this decision with the Information Regulator or a court. The process will be explained).
- Notification that a requested record cannot be located despite reasonable efforts. An affidavit will explain the search process and why access cannot be provided.

5. Availability of This Manual

This manual is available to the public in various ways:

- Online at www.rocksolidbrokers.co.za
- In printed form at the Rock Solid Brokers' office during business hours (free to inspect).
- Upon request for a copy (a reasonable fee may apply).
- Provided to the Information Regulator upon request.

The fee for a copy is based on the number of A4 photocopies made.

ANNEXURE A: CONTACT DETAILS & BUSINESS TYPE

A. Organisation Contact Details

Street address: 65 Scott Street, Schoemansville, Hartbeespoort, 0216

Phone number: 012 881 6380

Email address: admin@rocksolidbrokers.co.za

B. Head of Organisation

Full names and surname: Gerhardt Carl Delport

Email address: bernard@rocksolidbrokers.co.za.co.za

Phone number: 012 881 6380

C. Deputy Information Officer

Full names and surname: Jeanne Delport

Email address: jeanne@rocksolidbrokers.co.za

Phone number: 012 881 6380

D. Business Type

The organisation conducts its main type of business in Short-term insurance products (non-life)

Head Signature: _____

Date: _____

ANNEXURE B: A GUIDE TO USING PAIA

Head Signature: _____

Date: _____

This section explains how to access information under the Promotion of Access to Information Act (PAIA) and the Protection of Personal Information Act (POPIA).

The Guide

The Information Regulator has created a user-friendly guide to help you understand and exercise your rights under PAIA and POPIA.

This guide is available in all official South African languages, including braille.

Here's what you'll find in the guide:

- **The Goals of PAIA and POPIA:** This section explains the purpose of each act.
- **Contact Information:** You'll find contact details (including email addresses, if available) for:
 - Information Officers (IOs) in public bodies.
 - Deputy Information Officers (DIOs) in public and private bodies.
- **How to Request Access:** The guide details the proper procedures for requesting access to records:
 - Public body records under Section 11 of PAIA.
 - Private body records under Section 50 of PAIA.
- **Getting Help:** The guide explains the assistance available from:
 - The IO of a public body regarding PAIA and POPIA requests.
 - The Information Regulator regarding PAIA and POPIA.
- **Legal Remedies:** The guide outlines the legal options available if your rights under PAIA or POPIA are not upheld. This includes how to file:
 - Internal appeals.
 - Complaints with the Information Regulator.
 - Court applications challenging decisions by information officers, appeals, or the Regulator.
- **PAIA and POPIA Manuals:** This section explains the requirements for public and private bodies to create manuals outlining their information access procedures. It also details how to obtain these manuals.
- **Voluntary Disclosure:** The guide describes how public and private bodies can voluntarily disclose certain categories of records.
- **Fees:** The guide mentions notices issued regarding any fees associated with access requests.
- **PAIA Regulations:** This section details the regulations made under Section 92 of PAIA.

Obtaining the Guide

You can access the guide in several ways:

- Inspect or copy a physical copy at the offices of public and private bodies, including the Information Regulator, during business hours.
- Request a copy from the Information Officer of the relevant body.
- Obtain a copy from the South African Human Rights Commission
 - Tel: 011 877 3600
 - website: <https://www.sahrc.org.za/>
- Download the guide from the Information Regulator's website
 - website <https://www.justice.gov.za/>

ANNEXURE C: STATUTORY RECORDS MAINTAINED BY ROCK SOLID BROKERS

Head Signature: _____

Date: _____

This section (Annexure C) lists the laws that require Rock Solid Brokers to maintain specific records. These records are considered "statutory records".

Here's a breakdown of the relevant legislation:

- **Basic Conditions of Employment Act:** May necessitate records on employee working conditions, leave, and compensation.
- **Skills Development Act:** May require records on skills development initiatives and training programs.
- **Companies Act:** Likely requires records on company formation, governance, and financial activities.
- **Compensation of Occupational Injuries & Diseases Act:** May necessitate records on work-related injuries and illnesses, and associated compensation.
- **Unemployment Insurance Act:** May require records on unemployment insurance contributions and claims.
- **Consumer Protection Act:** May require records related to customer complaints, product safety, and fair-trading practices.
- **Promotion of Equality and Prevention of Unfair Discrimination Act:** May require records related to anti-discrimination practices and diversity initiatives.
- **Copyright Act:** Might necessitate records on copyrights owned or managed.
- **Electronic Communications and Transactions Act:** May require records related to electronic transactions and data security.
- **Employment Equity Act:** Likely necessitates records on employment equity practices and workforce demographics.
- **Financial Advisory & Intermediary Services Act:** May require records related to financial advice and intermediary services provided.
- **Financial Institutions (Protection of Funds) Act:** Might necessitate records on client protection measures for financial institutions.
- **Value Added Tax Act:** Likely necessitates records for value-added tax (VAT) purposes.
- **Financial Intelligence Centre Act:** May require records related to anti-money laundering and financial crime compliance.
- **Labour Relations Act:** May require records on labour relations practices, collective bargaining, and dispute resolution.
- **National Credit Act:** Might necessitate records related to creditworthiness assessments and debt collection practices.
- **Occupational Health and Safety Act:** May require records on workplace safety practices and incident reporting.
- **Short-term Insurance Act:** Likely necessitates records related to short-term insurance policies and claims.
- **Trademarks Act:** Might necessitate records on trademarks owned or managed.
- **Auditing Professions Act:** Likely requires records related to auditing practices and standards.

ANNEXURE D: AVAILABILITY OF RECORDS EXPLAINED

Head Signature: _____

Date: _____

This section details the categories of records held by Rock Solid Brokers, their availability for access, and the reasons for keeping them. It also clarifies who the information pertains to (data subject category).

Record Categories and Availability:

The table lists various record categories, with details for each:

- **Record:** The specific type of record within the category (e.g., Public Product Information).
- **Availability:** Whether the record is freely available or requires a formal PAIA request.
- **Purpose:** The reason for keeping the record (e.g., to convey public information).
- **Data Subject Category:** Who the information in the record pertains to (e.g., Organisation, Employees, Customers).

Freely Available Records:

These records can be accessed by anyone without a formal PAIA request. You can likely find them on the Rock Solid Brokers website or by contacting their Deputy Information Officer (DIO) (see Annexure A for contact details).

PAIA Request Records:

These records require a formal request following the procedures outlined in Annexure E.

Record Categories:

Here's a summary of the record categories:

- **Public Affairs:** Records related to public information about the organization (e.g., media releases, newsletters).
- **Regulatory & Administrative:** Records related to legal and administrative requirements (e.g., permits, licenses, policies).
- **Human Resources:** Records related to employee information and management (e.g., employment applications, contracts, benefits).
- **Financial:** Records related to the organization's financial activities (e.g., financial statements, tax records).
- **Marketing:** Records related to marketing activities and client information (e.g., market research, product brochures).
- **Client:** Records related to customer/client information and interactions (e.g., customer database, agreements, correspondence).
- **Third Party:** Records related to agreements and interactions with third parties (e.g., rental agreements, supplier contracts).

ANNEXURE E: HOW TO REQUEST INFORMATION UNDER PAIA

Head Signature: _____

Date: _____

This section explains how to formally request access to information held by Rock Solid Brokers under the Promotion of Access to Information Act (PAIA).

How to Submit Your Request:

1. Complete the [PAIA Request Form](#): Follow the link to fill out the form or request it to be provided by the Deputy Information Officer (DIO) (refer to Annexure A for contact details).
2. Submit the Form: Send the completed form to the DIO's email address.

Processing Timeline:

- The DIO will acknowledge receipt of your request.
- You will be notified if any fees apply before processing begins (refer to Annexure F for fee details). Personal requesters are exempt from fees.
- Once processed, the DIO will inform you of the decision and any additional fees.

Important Considerations:

- PAIA outlines reasons for refusing access to information. These reasons include:
 - Protecting privacy and interests of others.
 - Information already publicly available.
 - Cases where public interest is not served.
 - Protection of confidential commercial information of a third party.
 - Protection of certain confidential information of a third party.

Filling Out the PAIA Request Form:

- Identify Yourself: Provide your details.
- Specify the Information: Clearly describe the information you seek.
- Preferred Format: Indicate how you want to receive the information (e.g., printed copy, electronic copy).
- Contact Information: Provide your contact details.
- Justification: Explain why you need the information and how it helps you exercise or protect your rights.
- Communication Preference: Specify how you want to be informed of the decision regarding your request.
- Acting on Behalf of Someone: If requesting on someone else's behalf, include proof of authorization.

Fees:

- There may be a request fee, but personal requesters (requesting their own information) are exempt.
- The fee depends on the format you request and the time required to process your request.
- You'll be notified of the fee (if applicable) before processing begins.
- The form also allows you to claim exemption from fees if applicable.

Grounds for Refusal:

Your request may be denied under PAIA if:

- It would violate the privacy or interests of others.
- The information is already publicly available.
- Public interest is not served by disclosure.
- It would reveal confidential commercial information of a third party.
- It would reveal certain confidential information of a third party that must be protected.

Processing and Decisions:

- The DIO will acknowledge receipt of your request.
- They will inform you of the decision (approval/denial) and any applicable fees.

Appeals:

If your request is denied, you can appeal the decision following the procedures outlined in the PAIA guide (refer to Annexure B for details).

ANNEXURE F: FEES FOR REQUESTING INFORMATION UNDER PAIA

Head Signature: _____

Date: _____

This section details the fees associated with requesting information from Rock Solid Brokers under the Promotion of Access to Information Act (PAIA).

Important Notes:

- These fees apply only to requests that are not personal (meaning you are not requesting your own information).
- You'll be notified of any applicable fees before your request is processed.

Fee Breakdown:

1. **Request Fee (R130.00):** This is a one-time fee you must pay before your request is processed.
2. **Copying Fees:**
 - Photocopy/Printed Black & White (per A4 page): R2.20
 - Colour Copies (fee not specified, likely higher than R2.00)
3. **Electronic Copies:**
 - Flash Drive (provided by you): R45.00
 - Flash Drive (provided by Rock Solid Brokers): R120.00
4. **Transcription Fees:**
 - Visual Images (per A4 page): Service to be outsourced, price depends on provider quote.
 - Audio Recordings (per A4 page): R26.00
5. **Search and Preparation Fee: R425.00 (maximum)**
 - This fee covers the time it takes to locate and prepare the requested records. It only applies if the search takes longer than six hours. The first hour is free.
6. **Deposit (if applicable):** Up to one-third of the total copying and electronic copy fees (items 2-4). This deposit is required if preparing your request takes more than six hours.
7. **Postage/Delivery:** Actual cost of postage, email, or other electronic transfer (if applicable).

Appealing Fees:

You can challenge the request fee or deposit by filing an application with a court.

Withholding Records:

Rock Solid Brokers may withhold requested records until all applicable fees are paid.

ANNEXURE G: HOW ROCK SOLID BROKERS HANDLES YOUR PERSONAL INFORMATION

Head Signature: _____

Date: _____

This section explains how Rock Solid Brokers collects, uses, and protects your personal information.

Key Points:

- Rock Solid Brokers will only process your personal information with your informed consent and for specific purposes.
- They will inform you why they need your information before collecting it.
- They will only use your information for the purpose it was collected for, unless you consent to another use.

Information Collected:

Rock Solid Brokers may collect personal information from:

- **Individuals:** Name, address, ID numbers, employment details, bank details.
- **Businesses:** Names, registration numbers, VAT numbers, addresses, trade secrets, bank details.

Reasons for Collecting Information:

They collect information to establish business relationships with you.

Sharing Your Information:

Rock Solid Brokers may share your information with:

- Business partners (Insurers)
- Credit bureaus (for credit checks).
- South African Police Services (SAPS) and National Prosecuting Authority (NPA) (for legal reasons).
- Financial Services Conduct Authority (FSCA) (for regulatory purposes).
- Other third parties (only for lawful or legitimate reasons).

International Transfers:

Some information may be stored outside of South Africa.

Security Measures:

Rock Solid Brokers use various security measures to protect your information, including:

- Secure storage of paper documents.
- Anti-virus software and password protection for electronic systems.
- Encryption of files and data transfers.
- Secure file transfer protocols for sharing information with external parties.
- Firewalls to prevent unauthorized access to networks.
- Email security to protect against malicious emails.
- User access controls to restrict access to information based on job functions.
- Alarms for physical security.
- Network monitoring to detect and address security issues.

ANNEXURE H: APPOINTING A DEPUTY INFORMATION OFFICER (DIO)

Head Signature: _____

Date: _____

This section explains the role of the Deputy Information Officer (DIO) at Rock Solid Brokers and how they were appointed.

Legal Background

- The Protection of Personal Information Act (POPIA) requires private bodies to appoint an Information Officer (IO). The head of Rock Solid Brokers is the designated IO.
- The IO can delegate some of their responsibilities to a DIO.

Rock Solid Brokers' DIO

- Rock Solid Brokers have appointed Jeanne Delpont as their DIO.
- The DIO's role is to handle requests for access to records held by the organization.

DIO's Responsibilities

The DIO, along with the IO, is responsible for:

- Creating and maintaining an easy-to-understand guide on how to request access to information (likely referring to Annexes B, E, and F of this document).
- Facilitating the process of requesting information.
- Communicating with requesters about their requests.
- Deciding whether to grant full or partial access to a requested record.
- Ensuring timely and proper delivery of requested records.
- Keeping the information access guide up-to-date and communicating any changes.

DIO's Authority

- The DIO has the authority to:
 - Contact any Rock Solid Brokers staff member.
 - Request any records held by the organization.
- If a manager disagrees with the DIO accessing a record, they must explain their reasons to the IO, who will make the final decision.

Appointment of the DIO

- Bernard Delpont, the Head of Rock Solid Brokers, has appointed Jeanne Delpont as the DIO.

Head Signature

Date

Deputy Information Officer Signature

Date