PAIA MANUAL

FOR

iTOO SPECIAL RISKS (Pty) Ltd (iTOO)

PREPARED IN ACCORDANCE WITH SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT, NUMBER 2 OF 2000 (AS AMENDED)

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INTRODUCTION

The Promotion of Access to Information Act (PAIA), No. 2 of 2000 ("the Act") gives effect to the constitutional rights of access to information held by another person and that is required for the exercise or protection of any rights.

Requests in terms of the Act must be made in accordance with the prescribed procedures, at the rates provided. The forms and tariffs are dealt with in paragraphs 6 and 7 of the Act.

iTOO is an authorised Financial Services Provider (FSP), registered with the Financial Sector Conduct Authority (FSCA).

PURPOSE OF THIS MANUAL

2. In this PAIA manual, any reference to "iTOO" includes any of the entities listed below;

    a. iTOO Special Risks (Pty) Ltd (Reg. No. 2016/281463/07),
    b. iTOO Investments (Pty) Ltd (Reg. No. 2006/029139/07), and
    c. Renew Risks Africa (Pty) Ltd (Reg. No. 2014/020365/07).

3. This PAIA Manual is intended to ensure that iTOO complies with the Act and to foster a culture of transparency and accountability within iTOO by giving effect to the right to information that is required for the exercise or protection of any right and to actively promote a society in which the people of South Africa have effective access to information to enable them to exercise and protect their rights.

4. To promote effective governance of private bodies, it is necessary to ensure that everyone is empowered and educated to understand their rights in terms of the Act for them to exercise their rights in relation to public and private bodies.

5. Section 9 of the Act recognises that the right to access information cannot be unlimited and should be subject to justifiable limitations, including, but not limited to:

    a. Limitations aimed at the reasonable protection of privacy;
    b. Commercial confidentiality; and
    c. Effective, efficient, and good governance;

and in a manner which balances that right with any other rights, including such rights contained in the Bill of Rights in the Constitution.

In addition, this PAIA Manual complies with the requirements of Section 10 of the Act and recognises that upon commencement of the Protection of Personal Information Act 4 of 2013, that the appointed Information Regulator will be responsible to regulate compliance with the Act and its Regulations by Public and Private Bodies.

Please note that publication of this manual does not give rise to any rights to access records except as provided for in terms of PAIA.

About this manual:

To help you access information, this manual sets out the types of records that iTOO holds and the process to access these records. This manual is useful to:

- check the types of records iTOO holds where you must complete the form, as set out in PAIA, and how to submit your request to iTOO for processing;
- understand the records that iTOO holds that are available to you in terms of other laws;

access the contact details of the Information Officer and Deputy Information Officer, who will help you request the records you want to access;

PROCEDURE FOR OBTAINING ACCESS TO INFORMATION

6. Contact details

Any person who wishes to request any information from iTOO to protect or exercise a right may contact the Information Officer at the following contact details:

Registered Company Name:	iTOO Special Risks (Pty) Ltd
Registration Number:	2016/281463/07
Date of Incorporation:	21/07/2016
FSP Number:	47230
Business Address:	22 Oxford Road Parktown Johannesburg 2193
Postal Address:	P O Box 87419 Houghton Johannesburg 2041
Telephone:	011-351 5000
Website:	www.itoo.co.za

We have appointed one Information Officer and two Deputy Information Officers:

Information Officer:	Justin Naylor	justinn@itoo.co.za
Deputy Information Officer:	Rika Gerber	rikag@itoo.co.za
Deputy Information Officer:	Ryan van de Coolwijk	ryanv@itoo.co.za

The Information Regulator of South Africa can be reached at:

Physical Address:	JD House 27 Stiemens Street Braamfontein

	Johannesburg 2001
Postal Address:	P O Box 31533 Braamfontein Johannesburg 2017
Telephone:	010 – 023 5200
Website:	www.inforegulator.org.za
General Enquiries:	enquiries@inforegulator.org.za
Complaints:	POPIAComplaints@inforegulator.org.za; and PAIAComplaints@inforegulator.org.za

THE INFORMATION OFFICER (SECTION 51(1) (8))

4.1. The Act prescribes the appointment of an Information Officer for Private Bodies where such Information Officer is responsible to, inter alia, assess requests for access to information. The Head of a Private Body fulfils such a function in terms of section 51. iTOO has opted to appoint an Information Officer to assess requests for access to information as well as to oversee its required functions in terms of the Act. You can access our Privacy Policy on our website **www.itoo.co.za.**

4.2. The Information Officer appointed in terms of the Act also refers to the Information Officer as referred to in the Protection of Personal Information Act 4 of 2013. The Information Officer oversees the functions and responsibilities as required for in terms of both this Act as well as the duties and responsibilities in terms of section 55 of the Protection of Personal Information Act 4 of 2013 after registering with the Information Regulator.

4.3. The Information Officer may appoint, where it is deemed necessary, Deputy Information Officers, as allowed in terms of section 17 of the Act as well as section 56 of the Protection of Personal Information Act 4 of 2013. This is to render iTOO as accessible as reasonably possible for requesters of its records and to ensure fulfilment of its obligations and responsibilities as prescribed in terms of section 55 of the Protection of Personal Information Act 4 of 2013. All requests for information in terms of the Act must be addressed to the Information Officer and the appointed Deputy Information Officers, as per details in point number 3 above.

PROCESSING OF PERSONAL INFORMATION

Our privacy notice available on https://itoo.co.za/wp-content/uploads/2021/09/12-iTOO-Privacy-Notice-and-Policy_.pdf highlights why we process your personal information and how we protect it.

PROCEDURE FOR REQUESTS

6.1. In terms of PAIA, the following persons may request access to records held by iTOO:

- 6.2. A person requesting information about him/herself;
- 6.3. An agent requesting information on behalf of someone else;
- 6.4. A third-party requesting information of someone else; or
- 6.5. A public or private body requesting information for the exercise or protection of its rights or in the interest of the public.

A request for access to a record of iTOO must be made in the prescribed form to iTOO at the address, fax, or e-mail address provided in point number 3 above. The form must be addressed to the Information Officer using contact details described in point number 3 above.

Use the prescribed form, available on the website of the Information Regulator at https://www.inforegulator.org.za

Requesters must:

- provide sufficient particulars to enable the Information Officer to identify the record/s requested and must contain the name and contact details of the requester;
- indicate which form of access is required;
- specify a postal address or email address of the requester in South Africa;
- indicate the right exercised or to be protected and why the record is required to protect or exercise the right;
- where they need to be informed of the decision on the request in any other manner, state that manner and particulars to be so informed; and
- if the request is made on behalf of a person, submit proof in the form of an affidavit or signed letter of consent, of the capacity in which the requester is making the request to the satisfaction of the Information Officer.

PAYMENT OF FEES

- The Information Officer will notify the requester of the prescribed fee (if any) payable before further processing the request. Should a fee be required, proof of payment must be sent to the Information Officer together with the request.
- A requester seeking access to a record containing their own personal information will not be charged a request fee.
- The schedule of all fees payable for PAIA requests and related access to requested information is attached to this manual as **Annexure A.**
- If the request is granted the requester will be accordingly notified and a further fee must be paid. This would be for the search, reproduction, preparation, and time that exceed the

prescribed hours to search and prepare the disclosure.

TYPES OF RECORDS HELD BY iTOO

Requests for access to documents held by iTOO will be in accordance with the Act. The following records are available to the requester from the iTOO office:

7. Human Resources records

These include but are not limited to the following:

- Any personal records provided to iTOO by their personnel;
- any records a third party has provided to iTOO about any of their personnel;
- conditions of employment and other personnel-related contractual and quasi-legal records;
- internal evaluation records; and other internal records and correspondence.

8. Client-related records

A client in this instance refers to any natural or juristic entity (including brokers) who receives services from iTOO client-related information includes but is not limited to the following:

Any records a client has provided to a third party acting for or on behalf of iTOO; any records a third party has provided to iTOO; and records generated by or within iTOO pertaining to the client, including transactional records.

9. Financial, IT and Operational records

This includes but is not limited to the following:

Financial records; operational records; databases; information technology; marketing records; internal correspondence; product records; statutory records; internal policies and procedures; and records held by officials of iTOO.

10. Other Parties

iTOO may possess records pertaining to other parties, including without limitation, contractors, suppliers, subsidiary/holding companies, service providers.

Alternatively, such other parties may possess records which can be said to belong to iTOO. The following records fall under this category: Personnel, customer or iTOO records which are held by another party as opposed to being held by iTOO; and records held by iTOO pertaining to other parties, including without limitation financial records, correspondence, contractual records, records provided by the other party, and records third parties have provided about the contractors / suppliers.

RECORDS AVAILABLE IN TERMS OF OTHER APPLICABLE LEGISLATION

Records are available in accordance with the following legislation:

1. Basic Conditions of Employment Act,
2. Companies Act,
3. Compensation for Occupational Injuries & Diseases Act,
4. Electronic Communications and Transactions Act,
5. Employment Equity Act,
6. Financial Advisory and Intermediary Services Act,
7. Financial Intelligence Centre Act,
8. Financial Services Board Act,
9. Income Tax Act,
10. Labour Relations Act,
11. Occupational Health and Safety Act,
12. Protection of Personal Information Act,
13. Short Term Insurance Act,
14. Skills Development Act,
15. Skills Development Levies Act,
16. South African Qualifications Authority Act,
17. Unemployment Insurance Act,
18. Value Added Tax Act.

GROUNDS FOR REFUSAL

1. As prescribed in Section 25 of PAIA, justifiable grounds exist for iTOO to refuse or limit access to information and will inform the requester accordingly. Grounds for refusal include, but are not limited to;

1.1 mandatory protection of the privacy of a third party who is a natural person or a deceased person (section 63) or a juristic, as included in the Protection of Personal Information Act 4 of 2013, which would involve the unreasonable disclosure of personal information of that natural or juristic person;

1.2 mandatory protection of personal information and for disclosure of any personal information to, in addition to any other legislative, regulatory, or contractual agreements, comply with the provisions of the Protection of Personal Information Act 4 of 2013;

1.3 mandatory protection of the commercial information of a third party (section 64), if the record contains:

1.4 trade secrets of the third party;

- financial, commercial, scientific, or technical information which disclosure could likely cause harm to the financial or commercial interests of that third party;
- information disclosed in confidence by a third party to iTOO, if the disclosure could put that third party at a disadvantage in negotiations or commercial competition; mandatory protection of confidential information of third parties (section 65) if it is protected in terms of any agreement;

- mandatory protection of the safety of individuals and the protection of property (section 66);
- mandatory protection of records privileged from production in legal proceedings;
- protection of the commercial information of iTOO; or
- mandatory protection of the research information of a third party and of iTOO.

1.5 Requests for information that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources shall be refused.

1.6 All requests for information will be assessed on their own merits and in accordance with the applicable legal principles and legislation.

1.7 If a requested record cannot be found or if the record does not exist, the Information Officer shall, by way of an affidavit or affirmation, notify the requester that it is not possible to give access to the requested record. Such a notice will be regarded as a decision to refuse a request for access to the record concerned for the purpose of the Act. If the record should later be found, the requester shall be given access to the record in the manner stipulated by the requester in the prescribed form, unless the

Information Officer refuses access to such record.

DECISION

11. Time Allowed to Institution

- iTOO will, within 30 (thirty) days of receipt of the request, decide whether to grant or decline the request and give notice with reasons (if required) to that effect.
- The 30 (thirty) day period within which iTOO must decide whether to grant or refuse the request, may be extended for a further period of not more than thirty days if the request is for a large number of information, or the request requires a search for information held at another office of iTOO and the information cannot reasonably be obtained within the original 30 (thirty) day period.
- iTOO will notify the requester in writing should an extension be sought.

AVAILABILITY OF THE MANUAL

The manual is also available for inspection at iTOO's office, free of charge, and on the iTOO website (www.itoo.co.za)

UPDATING OF THE MANUAL

The Information Officer will on a regular basis update this manual.

Issued by

Justin Naylor
Managing Director and Registered Information Officer

ANNEXURE A PRESCRIBED FEES

1. PAIA sets out two (2) types of fees, namely, a request fee and an access fee, that are required to be paid prior to iTOO processing the request for access to a record.

2. A personal requestor, that is a requestor who requests access to a record containing personal information about him/herself, is not required to pay the request fee. Any other requestor will be required to pay the request fee.

3. The access fee in respect of the search, preparation and disclosure of records does not apply to the personal record of a requestor.

4. A request fee of R50.00 is payable up front where a requestor submits a request for access to information other than for personal information relating to the requestor himself/ herself.

5. Where a copy of the record needs to be posted the actual postal fee is payable.

6. Where iTOO receives a request for access to information regarding a person other than the requestor him/herself and the Information Officer is of the opinion that the preparation of the required record will take more than six (6) hours, a deposit of one third (1/3) of the amount of the applicable access fee will be payable.

7. The applicable fees which will be payable upfront are:

ITEM	RAND
Photocopy of A4-size page or part thereof	R 1.10
Printed copy of A4-size page or part thereof held on a computer or in electronic or machine-readable form	R 0.75
Copy in computer-readable form on stiffy disc	R 7.50
Copy in computer-readable form on compact disc	R 70.00
Transcription of visual images, for an A4-size page or part thereof	R 40.00
Copy of visual images	R 60.00
Transcription of an audio record, for A4-size page or part thereof	R 20.00
Copy of an audio record	R 30.00
Search for and preparation of the record for disclosure, for each hour or part of an hour reasonably required for such search and preparation	R 30.00