



**LIONEL ISAACS**  
INSURANCE BROKERS

Lionel Isaacs Insurance Brokers (Pty) Ltd (the "private body")

Financial Services Provider # 13343

**MANUAL**

In terms of The Promotion of Access to Information Act 2000 and

The Protection of Personal Information Act, 2013 (POPIA)

(the "ACT")

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<b><u>Reviewed and approved by:</u></b>	
Lance Williams (Information Officer)	
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## 1. Introduction

Lionel Isaacs Insurance Brokers (Pty) Ltd (FSP# 13343) is authorized to carry on business as a Financial Services Provider in respect of:

- **Long-term Insurance:** Category A, C
- **Short-term Insurance:** Personal Lines, Commercial Lines.
- **Financial intermediary services** for the above categories.

This manual has been prepared in accordance with PAIA (Act 2 of 2000) and POPIA (Act 4 of 2013) and is reviewed annually or upon legislative changes.

## 2. Purpose of the Manual

The manual provides:

- Procedures for requesting access to records
- Procedures for correction, deletion, or objection to processing personal information
- Guidance for staff and requesters on compliance with PAIA and POPIA
- Assurance of transparency, accountability, and protection of personal information

## 3. Introduction to PAIA

PAIA gives effect to the constitutional right of access to information held by public or private bodies where required for exercising or protecting rights.

### Key Points:

- Requests must comply with PAIA procedures and prescribed forms.
- Certain limitations exist, such as protection of **privacy, commercial confidentiality, and governance considerations.**
- Information Officer is responsible for evaluating requests and ensuring compliance.



#### 4. Introduction to POPIA

POPIA protects personal information processed by private and public bodies. It establishes rules for:

- Collection and processing of personal information
- Sharing, storage, and retention of information
- Rights of data subjects (access, correction, deletion, objection, complaint)
- Notification of data breaches
- Special personal information (health, financial, criminal data)

#### 5. Contact Details & Information Officer

- **Information Officer:**

- Lance Williams [lance.williams@icapital.co.za](mailto:lance.williams@icapital.co.za)

- **Deputy Information Officers:**

- Craig Watkins [cwatkins@liib.co.za](mailto:cwatkins@liib.co.za)
  - Alicia Hoffman [alicia.hoffman@icapital.co.za](mailto:alicia.hoffman@icapital.co.za)

- **Physical address:** 1st Floor, 33 Scott Street, Waverley, Johannesburg, 2090
- **Postal address:** PO Box 3436, Johannesburg, 2000
- **Telephone:** 011 483 1802 | **Fax:** 011 728 4350 | **Email:** [insurance@liib.co.za](mailto:insurance@liib.co.za)

The Information Officers are responsible for:

- Evaluating PAIA and POPIA requests
- Ensuring staff are trained on compliance
- Reporting data breaches to the Information Regulator and affected individuals



## 6. Decision-Making Process

- Evaluate the request and identify the records sought
- Verify the identity and capacity of the requester
- Determine whether access will be granted or refused based on PAIA and POPIA
- Respond within **30 days**, extendable to **60 days for complex requests**
- Notify requester of decision, grounds for refusal, or fees.

## 7. Who May Request Information

- Any person (South African or foreign) may request access to records if required to exercise or protect a right.
- PAIA Section 50: private body records are accessible if necessary for exercising/protecting a right.
- Requests must comply with prescribed forms, fees, and procedures.

## 8. Request for Information About a Third Party

- Must comply with **Sections 71-72 of POPIA** and relevant PAIA sections.
- Written consent from the third party is required unless disclosure is required by law.
- The requester must demonstrate the **reason for access**.

## 9. Correction, Deletion & Objections

- Section 24 of POPIA: request for correction or deletion of personal information
- **Section 11(3)(a):** objection to processing personal information
- Response within **30 days**, extendable to 60 days for complex requests
- Must use prescribed **Forms 1 & 2 of POPIA Regulations**

## 10. Data Subject Rights

- Right of access to personal information
- Right to correction and deletion
- Right to object to processing



- Right to withdraw consent
- Right to lodge a complaint with the **Information Regulator**
- Right to be notified in case of a **data breach**

## 11. Collection and Sharing of Personal Information

- **Collection Purposes:**

- Insurance underwriting, claims processing, premium collection, operational purposes
- Verification of identity and authority
- Fraud detection and prevention
- Audit, record-keeping, and regulatory reporting

- **Sharing Purposes**

- Regulatory authorities and compliance
- Legal obligations, court orders, or subpoenas
- With client consent for specific purposes
- Never sold for marketing without direct consent

## 12. Information Security Measures

- Allocation of responsibilities, access controls, and ID management
- Incident reporting and management
- Regular staff training
- Encryption of data in transit and at rest
- Backups and disaster recovery measures
- POPIA disclosures in client and operational processes

## 13. Record Retention Policy

- Retain records in accordance with **PAIA, POPIA, FICA, and other regulatory requirements**
- Records must be securely destroyed once retention period expires
- Includes client files, employee records, financial records, and correspondence



## 14. Applicable Legislation

- PAIA 2 of 2000
- POPIA 4 of 2013
- FICA 38 of 2001
- FAIS 37 of 2002
- Companies Act 71 of 2008
- ECTA 25 of 2002
- Consumer Protection Act 68 of 2008
- Financial Sector Regulation Act 9 of 2017
- Income Tax Act 58 of 1962, VAT Act 89 of 1991
- Employment-related legislation

## 15. Schedule of Records

- Company records, minutes, memoranda
- Financial records (PAYE, VAT, payments)
- Client and employee files
- Correspondence, research, and operational documents

## 16. Form of Request

- Use PAIA Form 2 for access requests
- Use PAIA Form 4 for internal appeals
- Must include: requester details, capacity, postal/email address, description of information, purpose, and right being exercised
- Submit electronically or physically

## 17. Fees

- Personal requester: no charge
- Other requesters: prescribed PAIA fees apply
- Fees for searching, copying, and preparation may be charged

## **18. Granting or Refusing Requests**

- Decision communicated within **30 days** (extendable to 60 days)
- Sufficient explanation provided if refused
- Prescribed fees applicable if request granted

## **19. Grounds for Refusal**

- Frivolous or vexatious requests
- Violates third-party privacy
- Privileged information (legal, commercial)
- Sections 63-69 PAIA and Section 34 POPIA

## **20. Remedies and Complaints**

- Internal appeal within 30 days
- Complaint to **Information Regulator**
- Court recourse if necessary

## **21. Automated Decision-Making & Profiling**

- Explain whether decisions use automated processing
- Rights to review and contest automated decisions

## **22. Data Breach Notification Procedure**

- Notify **Information Regulator as soon as possible**
- Notify affected data subjects
- Follow internal incident response plan

## **23. Availability of the Manual**

- Free inspection at office
- Electronic copy on company website or upon request

## **24. Review and Training**

- Manual reviewed **annually** or upon regulatory change
- Staff trained annually on PAIA and POPIA compliance



## 25. Annexure A - PAIA/POPIA Request Process Diagram

