PAIA MANUAL

Table of Contents

1. Procedure for obtaining access to information 3

2. The section 10 guide on how to use the Act 4

3. Types of records held by VCIB 4

4. The request procedure 6

5. Objecting to the processing of personal information 6

6. Request for correction or deletion of personal information 7

7. Refusal to provide personal information 7

8. Information security measures 7

9. Availability of the manual 7

1. PROCEDURE FOR OBTAINING ACCESS TO INFORMATION

- **Contact details**

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

Postal address	Physical address	Electronic
Unit G, Ground Floor, Morningside Close Business Park, Michelle Street, Morningside, 2196	Unit G, Ground Floor, Morningside Close Business Park, Michelle Street, Morningside, 2196	Tel: (011) 485 1124 E-mail: info@vcib.co.za Website: www.vcib.co.za

  - **The Information Officer:**

    Name: Bernice van Leeuwen
    Contact Number: 011 485 1124
    E-mail Adress: bernice@vcib.co.za

    The Deputy Information Officer:

    Name: Ryan Copeland
    Contact Number: ryan@vcib.co.za
    E-mail Adress: ryan@vcib.co.za

  - If you have submitted your request to the Information Officer, and your request has not been resolved within 6 weeks of you submitting your request, you may complain to the Information Regulator at:

    - https://www.justice.gov.za/inforeg/
    - Complaints.IR.justice.gov.za

- **Information Officers Decision-Making Responsibilities**

  In accordance with Section 55 of the Protection of Personal Information Act (POPIA), VCIB's Information Officer is responsible for overseeing and authorising decisions related to the processing and disclosure of personal information. This includes evaluating requests for access, objections to processing, or correction/deletion requests, and determining whether such requests meet the legal thresholds set by POPIA and PAIA. The Information Officer, supported by designated Deputy Information Officers and compliance personnel, ensures that all decisions are made lawfully, fairly, and within prescribed timeframes. In doing so, the Information Officer must balance the rights of the data subject with any legal obligations or third-party considerations, maintaining detailed records of all decisions and correspondence as part of good governance.

  To support effective compliance with POPIA and PAIA, the Information Officer of VCIB may delegate specific responsibilities to appointed Deputy Information Officers or authorised staff members. These delegated responsibilities may include receiving and acknowledging information requests, conducting preliminary assessments, liaising with requestors or third parties, and preparing recommendations for final decisions. However, the Information Officer retains overall accountability for ensuring that all decisions comply with applicable legislation and internal policies. All delegations are made in writing, with clear guidelines to ensure consistency, confidentiality, and lawful processing of personal information across the organisation.

- **Prescribed Access Form**

  - A request for access to a record of VCIB must be made in the prescribed contents to VCIB at the address or e-mail address provided above.
  - Requesters must:
    - provide sufficient particulars to enable the Information Officer to identify the record/s requested and must indicate who the requester is;
    - indicate which form of access is required;
    - specify a postal address in the RSA or email address of the requester;
    - identify 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 of their capacity to do so to the Information Officer's satisfaction.

2. THE SECTION 10 GUIDE ON HOW TO USE THE ACT

The Guide was compiled in accordance with the Information Regulator specifically to assist people to access records and exercise their right to information. The Guide is available in all South African official languages free of charge and any person may request a copy of the guide.

Please direct queries to:

The Information Regulator
Telephone: +27 010 023 5200
Website: https://inforegulator.org.za/contact-us
E-mail: helpdesk@inforegulator.org.za

3. TYPES OF RECORDS HELD BY VCIB

VCIB collects personal information to assess risk, manage policies, process claims, and improve customer service. We also use this information for marketing, legal compliance, and internal operations. VCIB does not share information across borders outside of South Africa.

- **Human Resources Records**
  These include but are not limited to the following:
  - Any personal records provided to VCIB by their personnel;
  - any records a third party has provided to VCIB 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.

- **Customer-related records**
  - A customer includes any natural or juristic entity who receives services from VCIB.
    Customer-related information includes but is not limited to the following:
  - Any records a customer has provided to a third party acting for or on behalf of VCIB;
  - any records a third party has provided to VCIB; and
  - records generated by or within VCIB pertaining to the customer, including transactional records.

- **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;
- treasury-related records;
- securities and equities; and
- records held by officials of VCIB.

- **Other Parties**

  VCIB may possess records pertaining to other parties, including without limitation, con tractors, suppliers, subsidiary/holding companies, joint venture companies, service providers.

  Alternatively, such other parties may possess records which can be said to belong to VCIB. The following records fall under this category: Personnel, customer or VCIB records which are held by another party as opposed to being held by VCIB; and records held by VCIB 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 legislation**

  The requester may also request information which is available in terms of legislation, such as the following:

  Basic Conditions of Employment Act, Companies Act, Compensation for Occupational Injuries & Diseases Act, Employment Equity Act, National Credit Act, Pension Funds Act, Financial Services Board Act, Income Tax Act, Labour Relations Act, Unemployment Insurance Act, Long Term Insurance Act, Occupational Health and Safety Act, Promotion of Equality and Prevention of Unfair Discrimination Act, Electronic Communications and Transactions Act, Short Term Insurance Act, Skills Development Act, Skills Development Levies Act, South African Qualifications Authority Act, VAT Act, Financial Intelligence Centre Act, Financial Advisory and Intermediary Services Act, Protection of Constitutional Democracy Against Terrorist and related Activities Act.

- **Disclosure of Personal Information**

  VCIB may disclose personal information only in circumstances permitted by law. This includes where disclosure is necessary to fulfill our contractual obligations as an insurance broker, such as to insurers, underwriters, or claims service providers; where required by law or regulatory authorities; with the consent of the data subject; or where such disclosure is necessary for the exercise or protection of a right. All disclosures are conducted in accordance with applicable data protection legislation, including the Protection of Personal Information Act (POPIA), and are limited to the minimum information required for the specific purpose.

4. THE REQUEST PROCEDURE

- In accordance with section 51(1)(b)(iv) of the Promotion of Access to Information Act, VCIB holds certain records that are not automatically available to the public and may only be accessed through a formal request in terms of PAIA. These include, but are not limited to, internal company policies and procedures, employee records, contractual agreements, client files, financial records, and correspondence. Access to these records will only be granted where the requestor complies with the procedural requirements of PAIA and where access is not refused on any grounds for refusal as set out in the Act.
- Any natural or juristic person may request access to information provided they show that the information is required for the exercise or protection of a right.
- The requester must make the request for access to a record to the above VCIB address or email address for the attention of the Information officer.
- The Information officer will notify the requester of the prescribed fee (if any) payable before further processing the request.
- A requester reasonably seeking access to a relevant record containing their own relevant personal information will not be charged a request fee.
- The fees (excluding VAT) that the requester must pay to VCIB is as follows:
    - For every photocopy of an A4-sized page or part thereof - R1,00
    - For every printed copy of an A4 sized page or part thereof held on a computer or in electronic form - R1,00
    - For a copy in a computer-readable form on a compact disk - R50,00
    - For a copy of an audio report - R20,00
    - Any other request - R50,00
    - An additional fee may be charged should documentation / information have to be searched for and prepared for disclosure - R40,00 per hour
- The requester may lodge an application to court against the tender or payment of the fee.
- 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.
- In terms of Section 71 of the Protection of Personal Information Act (POPIA), VCIB may not disclose personal information about a third party to a requestor unless the disclosure is permitted by law or the third party has provided their written consent. Where a request for access to records contains personal information of a third party, VCIB will notify the third party in writing and give them an opportunity to make representations as to why the information should not be disclosed. Any decision to grant or deny access will take into account the rights of all parties involved, in line with the provisions of POPIA and PAIA.

5. OBJECTING TO THE PROCESSING OF PERSONAL INFORMATION

In terms of Section 11(3)(a) of the Protection of Personal Information Act (POPIA), a data subject has the right to object, at any time, to the processing of their personal information where such processing is carried out on the basis of legitimate interests, the performance of a public law duty, or for direct marketing purposes. This objection must be submitted in the prescribed manner using the relevant form as outlined in POPIA regulations. Upon receipt of a valid objection, VCIB will assess the request and, where applicable, cease processing the personal information unless there are legitimate grounds to continue as provided for under POPIA.

6. REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION

In accordance with Section 24(1) of the Protection of Personal Information Act (POPIA), a data subject may, by submitting the prescribed form, request VCIB to correct or delete personal information held about them that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, or obtained unlawfully. Upon receipt of such a request, VCIB will evaluate the submission, take reasonable steps to verify the information, and respond within a reasonable time in accordance with POPIA. If the request is approved, the necessary correction, deletion, or destruction will be carried out, and the data subject will be notified accordingly.

7. REFUSAL TO PROVIDE PERSONAL INFORMATION

Refusal may occur if disclosure would result in a breach of privacy, prejudice investigations, infringe third-party rights, compromise commercial confidentiality, or where the request is frivolous or vexatious. VCIB will provide written reasons for any refusal, inform the requester of their right to lodge a complaint with the Information Regulator or seek a court review, and ensure that all refusals are consistent with POPIA's protection of privacy and access to information principles.

Where VCIB has refused the access to personal information, the below remedies are available to the requestor:

1. **Internal Appeal**
   The requester can ask VCIB to review the decision internally. This might involve submitting a formal appeal or complaint to the Information Officer or a designated appeals officer within the organisation.
2. **Complaint to the Information Regulator**
   If the internal appeal doesn't resolve the issue, the requester can lodge a complaint with the Information Regulator (South Africa's privacy watchdog). The Regulator can investigate the refusal and order remedies or sanctions.
3. **Judicial Review**
   The requester can approach a court to review the decision to refuse access. The court can order that the information be disclosed if it finds the refusal was not justified under POPIA or PAIA.
4. **Alternative Dispute Resolution**
   The Regulator or parties may also engage in mediation or other dispute resolution processes to find a fair outcome without court involvement.

8. INFORMATION SECURITY MEASURES

VCIB is committed to safeguarding the confidentiality, integrity, and availability of all personal information it processes. To this end, VCIB implements robust information security measures, including role-based access controls, multi-factor authentication, and encryption of personal data both in transit and at rest. Physical security of data storage areas is maintained through controlled access and secure facilities. Regular data backups and a tested disaster recovery plan ensure continuity and availability of information. Staff receive ongoing training on data protection and information security best practices, while an incident response plan is in place to address potential data breaches swiftly and effectively. Additionally, VCIB ensures that third-party service providers comply with equivalent security standards through contractual agreements. These measures are continually reviewed and updated to comply with applicable legislation, including the Protection of Personal Information Act (POPIA), and to uphold the highest standards of data protection. The manual is also available for inspection at VCIB's office, free of charge, as well as on the VCIB's website, and copies are

9. AVAILABILITY OF THE MANUAL

- The manual is also available for inspection at VCIB's office, free of charge, as well as on the VCIB's website, and copies are available at the South African Human Rights Commission.

FORM 2

REQUEST FOR ACCESS TO RECORD

[Regulation 7]

NOTE:

1. *Proof of identity must be attached by the requester.*
2. *If requests made on behalf of another person, proof of such authorisation, must be attached to this form.*

TO: The Information Officer

_____
_____
_____
_____
(Address)

E-mail address: _____

Fax number: _____

*Mark with an **"X"***

☐ Request is made in my own name ☐ Request is made on behalf of another person.

PERSONAL INFORMATION				
Full Names				
Identity Number				
Capacity in which request is made *(when made on behalf of another person)*				
Postal Address				
Street Address				
E-mail Address				
Contact Numbers	Tel. (B):		Facsimile:	
	Cellular:			
Full names of person on whose behalf request is made *(if applicable):*				
Identity Number				
Postal Address				

Street Address				
E-mail Address				
Contact Numbers	Tel. (B)		Facsimile	
	Cellular			

PARTICULARS OF RECORD REQUESTED

Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located. (*If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)*

Description of record or relevant part of the record:	
Reference number, if available	
Any further particulars of record	

TYPE OF RECORD
*(Mark the applicable box with an "**X**")*

Record is in written or printed form	
Record comprises virtual images *(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)*	
Record consists of recorded words or information which can be reproduced in sound	
Record is held on a computer or in an electronic, or machine-readable form	

FORM OF ACCESS *(Mark the applicable box with an "**X**")*	
Printed copy of record *(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)*	
Written or printed transcription of virtual images *(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)*	
Transcription of soundtrack *(written or printed document)*	
Copy of record on flash drive *(including virtual images and soundtracks)*	
Copy of record on compact disc drive*(including virtual images and soundtracks)*	
Copy of record saved on cloud storage server	

MANNER OF ACCESS *(Mark the applicable box with an "**X**")*	
Personal inspection of record at registered address of public/private body *(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)*	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format *(including transcriptions)*	
E-mail of information *(including soundtracks if possible)*	
Cloud share/file transfer	
Preferred language *(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)*	

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED *If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.*	
Indicate which right is to be exercised or protected	

Explain why the record requested is required for the exercise or protection of the aforementioned right:	

FEES	
a) A request fee must be paid before the request will be considered. *b) You will be notified of the amount of the access fee to be paid.* *c) The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.* *d) If you qualify for exemption of the payment of any fee, please state the reason for exemption*	
Reason	

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	**Facsimile**	**Electronic communication** ***(Please specify)***

Signed at _____ this _____ day of _____ 20 _____

_____

Signature of Requester / person on whose behalf request is made

---

FOR OFFICIAL USE

Reference number:	
Request received by: (State Rank, Name And Surname of Information Officer)	
Date received:	
Access fees:	
Deposit (if any):	

_____

Signature of Information Officer