Suretimes Insurance Administrators (Pty) Ltd

PAIA MANUAL

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

Date of revision: 01 March 2027

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1. LIST OF ACRONYMS AND ABBREVIATIONS

- "CEO" means Chief Executive Officer (or equivalent senior executive where applicable);
- "DIO" means Deputy Information Officer;
- "IO" means Information Officer;
- "Minister" means the Minister of Justice and Correctional Services;
- "PAIA" means the Promotion of Access to Information Act No. 2 of 2000 (as amended);
- "POPIA" means the Protection of Personal Information Act No. 4 of 2013;
- "Regulator" means the Information Regulator (South Africa);
- "Republic" means the Republic of South Africa;
- "FICA" means the Financial Intelligence Centre Act No. 38 of 2001;
- "FAIS" means the Financial Advisory and Intermediary Services Act No. 37 of 2002;

2. PURPOSE OF PAIA MANUAL

This Manual is prepared in terms of section 51 of PAIA and is intended to assist members of the public and data subjects to understand the categories of records held by the Company, how to request access to records, the records available under other legislation, and how the Company processes personal information in accordance with POPIA.

- the categories of records held by the Company that may be available without a formal request;
- how to request access to records held by the Company;
- the records available in terms of other legislation;
- the contact details of the Information Officer and Deputy Information Officer;
- how to obtain the PAIA Guide published by the Information Regulator;
- the purposes for which personal information is processed;
- the categories of data subjects and personal information processed;
- the recipients or categories of recipients to whom personal information may be supplied;
- planned transborder flows of personal information, where applicable; and
- a general description of information security measures.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION

Field	Details
Private Body	Suretimes Insurance Administrators (Pty) Ltd
Trading Name	SureTimes Insurance Administrators
FSP Number	FSP 1962
Business Description	Insurance administration, policy servicing, premium administration, claims administration support, binder and delegated administrative functions, and related insurance support services
Information Officer	Dan Payton (Director / Information Officer)
Information Officer Email	Dan@grib.co.za
Deputy Information Officer	Misha McLean (Deputy Information Officer)
Deputy Information Officer Email	compliance@groupserve.online
General Access to Information Email	compliance@groupserve.online
Postal Address	PO Box 3441 Knysna, 6570
Physical Address	Unit 5 Quayside Office Park, Cnr Gordon & Hedge Street, Knysna, 6570
Telephone	087 233 8770
Website	www.suretimes.co.za

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

The Information Regulator has, in terms of section 10(1) of PAIA, updated and made available the revised Guide on how to use PAIA 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.

The Guide is available from the Information Regulator and may be obtained as follows:

Field	Details
Website	https://inforegulator.org.za/
Alternative portal	https://www.justice.gov.za/inforeg/
General enquiries	enquiries@inforegulator.org.za
Complaints	complaints.IR@justice.gov.za

A copy of the Guide should also be made available for inspection at the Company's offices during normal business hours, where reasonably practicable.

5. CATEGORIES OF RECORDS WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Category of Record	Types of Record	Available on Website	Available on Request
Corporate / Public Information	Website information, product / service descriptions, general contact details	Yes	Yes
Compliance / Governance	PAIA Manual, POPIA Privacy Notice, complaints process summary (where published)	Yes / if published	Yes
Marketing / Public Material	Brochures, public notices, newsletters, public-facing documents	Yes / if published	Yes

Records not listed above may still be requested in terms of PAIA, subject to the requirements of PAIA and any applicable grounds for refusal.

6. DESCRIPTION OF THE RECORDS AVAILABLE IN ACCORDANCE WITH OTHER LEGISLATION

Category of Record	Applicable Legislation
Memorandum of Incorporation / company records	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000
Personal information processing records / privacy governance	Protection of Personal Information Act 4 of 2013
FICA client due diligence / KYC records	Financial Intelligence Centre Act 38 of 2001
Representative and advisory records (where applicable)	Financial Advisory and Intermediary Services Act 37 of 2002
Insurance administration / delegated function records	Insurance Act 18 of 2017 and applicable delegated authority / binder framework where applicable
Employment records	Basic Conditions of Employment Act 75 of 1997; Labour Relations Act 66 of 1995; Employment Equity Act 55 of 1998
Tax / financial records	Income Tax Act 58 of 1962; Value-Added Tax Act 89 of 1991; Tax Administration Act 28 of 2011
Health and safety records	Occupational Health and Safety Act 85 of 1993
Electronic records and communications	Electronic Communications and Transactions Act 25 of 2002

7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT

Subject	Categories of Records
Corporate Governance	MOI, director records, resolutions, governance policies, compliance registers, licences / authorities
Regulatory / Compliance	PAIA / POPIA records, FICA records, complaints records, conflict management, compliance

	reports, training records
Client / Policy Administration	Client files, mandates, policy schedules, underwriting information, claims records, instructions, correspondence, policy servicing records
Binder / Delegated / Administrative Services	Service level agreements, delegated authority documents, insurer mandates, bordereaux, reconciliations, administration records
Finance	Financial statements, accounting records, invoices, bank records, premium / commission reconciliations, tax records
Human Resources	Employment contracts, payroll records, leave records, performance records, disciplinary records, benefits records
IT / Systems / Security	System access logs, backups, vendor agreements, information security policies, incident records
Third Party / Suppliers	Supplier contracts, NDAs, service agreements, invoices, correspondence

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

- to administer insurance-related products, services, policies, claims and delegated / binder functions;
- to communicate with clients, insurers, underwriters, service providers and regulators;
- to perform onboarding, due diligence, verification and anti-fraud checks;
- to comply with FAIS, FICA, POPIA, tax, employment and other legal obligations;
- to maintain operational, accounting, governance and risk management records;
- to manage employees, contractors, suppliers and representatives; and
- to conduct lawful business development and relationship management activities.

8.2 Description of 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 / policyholders / insureds	Names, registration / ID numbers, contact details, addresses, banking details, policy information, claims information, risk information, compliance documents
Directors / members / authorised signatories	Names, ID numbers, contact details, signatures, authority records, KYC / FICA information
Employees / representatives	Contact details, HR records, payroll records, qualifications, performance and disciplinary records, system access records
Insurers / underwriters / administrators / binder counterparties	Business contact details, contractual and operational records
Suppliers / service providers / operators	Business details, banking details, contracts, tax details, contact information
Complainants / claimants / third parties	Contact details, claim information, correspondence, supporting documents, legal / evidentiary records

8.3 The Recipients or Categories of Recipients to whom Personal Information may be Supplied

Category of Personal Information	Recipients / Categories of Recipients
Identity, KYC and client due diligence information	Insurers, underwriters, FICA verification providers, compliance service providers, regulators where required
Policy, underwriting and claims information	Insurers, underwriting managers, administrators, loss adjusters, assessors, claims handlers, attorneys, recovery agents
Financial / payment information	Banks, payment processors, accountants, auditors, tax advisors
HR and payroll information	Payroll providers, benefit administrators, labour advisors, regulators where required
Operational and system information	Approved IT providers, cloud service providers, CRM and communications platforms

8.4 Planned Transborder Flows of Personal Information

The Company may use cloud-based systems or approved operators and service providers whose infrastructure, support functions or backup environments may be hosted in or accessible from jurisdictions outside the Republic of South Africa. Where this occurs, the Company will take reasonably practicable steps to ensure that such transborder processing or transfer complies with section 72 of POPIA and that appropriate contractual, organisational and/or technical safeguards are in place.

8.5 General Description of Information Security Measures

- role-based access controls and least-privilege access management;
- password controls and multi-factor authentication where available;
- anti-virus, anti-malware and endpoint protection;
- secure backups and disaster recovery controls where reasonably practicable;
- confidentiality obligations and staff awareness training;
- physical access controls to offices and filing areas;
- secure destruction / disposal of records; and
- incident escalation and breach response procedures.

9. AVAILABILITY OF THE MANUAL

- on the Company's website, where published: www.suretimes.co.za;
- at the Company's head office / business premises for public inspection during normal business hours;
- to any person upon request, subject to the payment of a reasonable prescribed fee where applicable; and
- to the Information Regulator upon request.

A fee for a copy of the Manual may be payable per A4-size photocopy made, subject to the applicable regulations and current prescribed fee framework.

10. UPDATING OF THE MANUAL

The Information Officer of Suretimes Insurance Administrators (Pty) Ltd will, on a regular basis and at least when reasonably required by legal, operational or regulatory changes, review and update this Manual.

Issued by:
Dan Payton
Director / Information Officer