



Vodacom Insurance Company (RF) Limited Access to Information Manual  
(In accordance with section 51 of the Promotion of Access to Information Act No. 2 of 2000) (“Manual”)

## Policy Statement

It is Vodacom Insurance Company (RF) Limited’s policy to conduct its operations in compliance with all legal and regulatory requirements. This Access to Information Manual (“**the Manual**”) regulates access to information and records owned, held by or otherwise under the control of Vodacom Insurance Company (RF) Limited and the release of any such information or records of Vodacom Insurance Company (RF) Limited’s directors, officers, employees, agents or anyone acting on its behalf or authority. This Manual should be read in conjunction with, and is aimed at ensuring compliance with, the Promotion of Access to Information Act No. 2 of 2000 (“**PAIA**” and/or “**the Act**”) and the Vodacom Group policy relating to meeting regulatory requirements and the Vodacom (Pty) Ltd Compliance Policy.

## Application

This Manual applies to information and records owned, held by or otherwise under the control of Vodacom Insurance Company (RF) Limited and the release of any such information or records.

## Objective

The objectives of this Manual are to:

- provide a non-exhaustive list of information, records and other details held by Vodacom Insurance Company (RF) Limited;
- set out the procedure for requesting information or records in terms of the PAIA and the Protection of Personal Information Act No. 4 of 2013 (“**POPIA**”) as well as the grounds on which a request may be refused;
- define the manner and form in which a request for information must be submitted; and
- align with the requirements of POPIA.



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(In accordance with section 51 of the Promotion of Access to Information Act No. 2 of 2000) (“Manual”)

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## 1. Introduction

### 1.1 PAIA requirements relating to access to information held by a Private Body

Section 51 of the Act requires a Private Body to compile a manual setting out the procedure and requirements to be adhered to in seeking to obtain access to information held by that Private Body. The section also stipulates the minimum requirements a manual has to comply with. To this end section 51 of the Act requires the manual to contain, amongst others, the following:

- The postal and street address, phone, and fax number and, if available, electronic mail address of the Head of the Private Body;
- A description of the PAIA guide developed by the Human Rights Commission, and how to obtain access to it;
- Contact details of the Head of the Private Body;
- Categories of records available without a person making a formal PAIA request, if any;
- A description of the records available in accordance with other legislation;
- Sufficient detail to facilitate a request for access to a record of the Private Body;
- A description of the categories of subjects and of the information or categories of information;
- A description of the subjects on which the body holds records and the categories of records held on each subject,
- Such other information as may be prescribed.

### 1.2 POPIA requirements pertaining to the processing of information

- Purpose of processing

In terms of POPIA, Personal Information must be processed for a specific, explicitly defined, and lawful purpose. The purpose for which Personal Information is processed by Vodacom Insurance Company (RF) Limited will depend on the nature of the Personal Information and the particular Data Subject. This purpose is ordinarily disclosed in writing to the Data Subject at the time the Personal Information is collected.

- Access to Information

POPIA provides that a Data Subject may, upon adequate proof of identity, request the Responsible Party to confirm, free of charge, whether or not the Responsible Party holds Personal Information about the Data Subject and may request a record or description of such information, including information about the identity or categories of third parties who have or have had access to such information.



Further, POPIA provides that where the Data Subject is required to pay a fee for services provided to him/her, the Responsible Party must provide the Data Subject with a written estimate of the payable amount before providing the service and may require that the Requestor pay a deposit for all or part of the fee.

- Categories of Data Subjects

Vodacom Insurance Company (RF) Limited holds information and records relating to the following individuals and entities:

- a) employees / personnel of Vodacom Insurance Company (RF) Limited;
- b) clients/customers of Vodacom Insurance Company (RF) Limited;
- c) any third party and/or supplier with whom Vodacom Insurance Company (RF) Limited conducts its business;
- d) contractors of Vodacom Insurance Company (RF) Limited;
- e) partners and agents
- f) service providers of Vodacom Insurance Company (RF) Limited.

(This list of categories of Data Subjects is non-exhaustive)

- The categories of recipients to whom the information is supplied

Depending on the nature of the requested Information, Vodacom Insurance Company (RF) Limited may supply information or records to the following categories of recipients:

- a) statutory oversight bodies, regulators (such as the Information Regulator), law enforcement agencies or judicial commissions of enquiry making a request for information
- b) any court, administrative or judicial forum, arbitration, statutory commission, or ombudsman making a request for data or discovery in terms of the applicable rules;
- c) South African Revenue Services, or another similar authority;
- d) anyone making a successful application for access in terms of PAIA, to the extent that such access is partially or wholly permitted in terms of PAIA, as amended by POPIA;
- e) any third party and/or supplier with whom Vodacom Insurance Company (RF) Limited conducts its business;
- f) contractors of Vodacom Insurance Company (RF) Limited;
- g) partners and agents Insurance Company (RF) Limited;



- h) service providers of Vodacom Insurance Company (RF) Limited;
- i) third parties that we use to provide you with marketing and advertisements; and
- j) companies in the Vodacom (Pty) Ltd and Vodafone Group, including their subsidiaries.

- Planned trans-border flows of information

Vodacom Insurance Company (RF) Limited can send or transfer Personal Information of Data Subjects to Vodafone group companies and/or third parties who are authorised to process personal information on Vodacom Insurance Company (RF) Limited's behalf, beyond the borders of the countries in which Personal Information is collected in order to achieve the purpose for which the Personal Information was collected and Processed, including for Processing and storage by such authorised third parties. Vodacom Insurance Company (RF) Limited will only engage in the cross-border transfer of information if one of the following conditions are met (as approved by the Privacy Officer):

- The recipient is subject to existing legislation in his /her/its country or to binding corporate rules or to a binding agreement that provides an adequate level of protection for the personal information that is substantially similar to the data protection laws applicable to South Africa;
- The Applicable Data Subject has consented to such cross-border transfer;
- The transfer is necessary for the conclusion and/or performance of a contract between Vodacom Insurance Company (RF) Limited and the Data Subject;
- The transfer is necessary for the conclusion or performance of a contract entered into, in the interest of the Data Subject, between Vodacom Insurance Company (RF) Limited and the relevant Vodacom group company or the authorised third party; or
- The transfer is to the benefit of the Data Subject and must take place in circumstances under which it is not reasonably possible to obtain the Data Subject's consent and if it were reasonably possible to obtain such consent, the Data Subject would be likely to give it.
- The processing of Personal Information in a foreign jurisdiction may be subject to the laws of the country in which it is held, and may be subject to disclosure to the Governments, Courts of law, Enforcement or Regulatory Agencies of such other country, pursuant to the laws of such country. Vodacom Insurance Company (RF) Limited will ensure the adequate protection of your Personal Information where such disclosures are required.



- Security measures are implemented to ensure the confidentiality and privacy of the information which is to be processed.

Vodacom Insurance Company (RF) Limited is committed to implementing leading data security safeguards. For this reason, Vodacom Insurance Company (RF) Limited has specialised security teams who constantly review and improve its measures to secure the integrity and confidentiality of your Personal Information by taking appropriate, reasonable technical and organisational measures to protect it from unauthorised or unlawful access, accidental loss, damage, disclosure or destruction.

If Vodacom Insurance Company (RF) Limited has an agreement with another organisation to provide it with services on its behalf to process your Personal Information, then Vodacom Insurance Company (RF) Limited will ensure that they have appropriate security measures in place that are equal to the security measures implemented by Vodacom Insurance Company (RF) Limited and only process your Personal Information in the way we have authorised them to. These organisations will not be entitled to use your Personal Information for their own purposes. If necessary, our security teams will audit them to ensure they meet our security requirements.

Communications over the internet (such as emails) are not secure unless they have been encrypted. Further, your communications may go through several countries before being delivered, as this is the nature of the internet. Consequently, we cannot accept responsibility for any unauthorised access or loss of Personal Information that is beyond our control.

## 2. Definitions

The following words shall bear the same meaning as under POPIA:

- 2.1 “**Consent**” means a voluntary, specific, and informed expression of will in terms of which a Data Subject agrees to the processing of Personal Information relating to him or her
- 2.2 “**Data Subject**” means the person to whom Personal Information relates
- 2.3 “**Information Officer**” means the Head of Vodacom Insurance Company (RF) Limited, equivalent officer, duly authorised person or any person who is acting as such as contemplated in section 1 of the Act
- 2.4 “**Minister**” means the Minister of Justice and Correctional Services
- 2.5 “**Personal information**” means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person including:
  - (a) information relating to the race, gender, sex, pregnancy, marital status, national, ethnic, or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;



- (b) information relating to the education or the medical, financial, criminal or employment history of the person;
- (c) any identifying number, symbol, e-mail address, physical address, telephone number or other particular assignment to the person;
- (d) the blood type or any other biometric information of the person;
- (e) the personal opinions, views, or preferences of the person;
- (f) correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
- (g) the views or opinions of another individual about the person; and
- (h) the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.

2.6 “**Private Body**” means a natural person who carries or has carried on any trade, business or profession in that capacity, a partnership or juristic person

2.7 “**Processing**” means any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including:

- (a) the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation, or use;
- (b) dissemination by means of transmission, distribution or making available in any other form; or
- (c) merging, linking, as well as blocking, degradation, erasure, or destruction of information.

2.8 “**Public Body**” means any department of state or administration in the national, provincial, or local sphere of Government or functionary exercising public power or exercising public function in terms of any legislation;

2.9 “**Responsible Party**” means a public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for processing Personal Information;

2.10 “**Requester**” means any person, including, but not limited to, a public body or an official thereof, making a request for access to a record of that private body (or authorised representative).

### 3. Particulars Required in terms of the Section 51(1)(a) of PAIA

Company Registration: Vodacom Group Limited	1993/005461/06
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Vodacom Insurance Company (RF) Limited	2011/117744/06
Duly Authorised Information Officer	Mr Jacques Du Preez
Street Address	Vodacom Corporate Park, 082 Vodacom Boulevard, Midrand, 1685
Postal Address	Private Bag X9904, Sandton, 2146
Telephone	011 653 5000
Website	<a href="http://www.vodacom.co.za">www.vodacom.co.za</a>
E mail	Lifecompliance@vodacom.co.za

#### 4. The Human Rights Commission PAIA Guide

The Human Rights Commission PAIA guide provides information on PAIA. This guide will assist people in making requests for information under PAIA and provides examples on how PAIA has been used in the past to advance human rights. It does this by providing:

- An easy to understand overview of PAIA;
- A breakdown of how PAIA can be used to advance other human rights;
- A list of types of information which can be requested using PAIA; and
- A step-by-step guide on how to use PAIA to make an information request.

\*This guide can be accessed at the following link

<https://www.sahrc.org.za/home/21/files/Section%2010%20guide%202014.pdf>

#### 5. Entry Point for Requests for Information

In order to ensure that Vodacom Insurance Company (RF) Limited complies with the Act, any request in terms of the Act must be channeled as set out below.

All requests in terms of the Act must be addressed to:

**THE HEAD OF VODACOM INSURANCE COMPANY (RF) LIMITED**

##### Physical Address

Mr Jacques Du Preez (Information Officer) Vodacom Corporate Park, 082 Vodacom Boulevard, Midrand, 1685

##### Postal Address





Mr Jacques Du Preez (Information Officer)

Private Bag X 9904, Sandton, 2146

### Other

Telephone: 011 653 5000

Electronic mail: Lifecompliance@vodacom.co.za

## 6. List of Records and Information

The categories of information listed are not exhaustive but are merely meant to give a broad indication of the information subject and categories held by Vodacom Insurance Company (RF) Limited, without specification.

A category may therefore contain sub-categories and sub-sets of information, which are not specifically listed. (For purposes of the list of records and information held by Vodacom Insurance Company (RF) Limited see Appendix A: Categories and Types of Information).

## 7. Who May Request Information or Records?

### a. The purpose for which Information is required

The Act provides that a person may only request information in terms of the Act if that information is required for the exercise or protection of a right.

- POPIA provides that a Data Subject may, upon adequate proof of identity, request the Responsible Party to confirm, free of charge, whether or not the Responsible Party holds Personal Information about the Data Subject all the information it holds about the Data Subject and may request a record or description of access to such information, including information about the identity or categories of third parties who have or have had access to such information. Must provide the Data Subject with a written estimate of the payable amount before providing the service
- The Responsible Party may require that the requestor pay a deposit for all or part of the fee

### b. Categories of Requestors

The capacity under which a Requester requests documentation/ information will determine the category he/she/it falls in. Please note that the Requester category has a bearing on the conditions of access to the information.



Requesters have been classified into four categories:

- A Personal Requester: requests information about himself/herself/itself.
- A Representative Requester: requests information relating to and on behalf of someone else.
- A Third-Party Requester: requests information about another person.
- A Public Body: requests information in the public interest.

## 8. Request Procedure

### a. Form of Request

Any request for information in terms of the Act must be submitted in terms of Form C (a copy of the form is enclosed as Annexure B hereto). These forms are available on request from [customer care](#) and upon payment of a prescribed fee (if applicable). The forms can also be downloaded from [www.vodacom.co.za](http://www.vodacom.co.za).

Form C must be completed in full and returned to the Information Officer at the address referred to in paragraph 5 above together with any other information that may be required in order to consider and decide on the request. A request which does not comply with the formalities contained in this Manual will be referred back to the Requester with advice on the necessary steps for compliance. This includes Forms that are not completed in full.

The Affidavit contained in Form C must also be completed in full and signed by a Commissioner of Oaths,

### b. Proof of identity

Proof of identity is required to authenticate the request and the Requester. Therefore, a Requester will, in addition to Form C, be required to submit acceptable proof of identity such as a certified copy of their Identity Document, Driver's Licence or Passport.

### c. Procedure to be followed by the Requester

The following procedure must be followed when requesting information and/or documents:

- The request must be sent in the prescribed Form C accompanied by the prescribed affidavit (Annexure B). (The form can be downloaded from Vodacom's website at [www.vodacom.co.za](http://www.vodacom.co.za) or requested from the Information Officer at the address as set out in paragraph 5 of the Manual).
- The request must be submitted to the Information Officer and sent to the address, fax number or electronic mail address as set out in paragraph 5 of the Manual.
- The Requestor must provide proof of identity of the person requesting the record



- If the request is made on behalf of another person, the Requestor must provide proof of the capacity in which he/she/it is making the request.

In instances where information or records pertaining to any of Vodacom Insurance Company (RF) Limited's products (other than marketing information) is requested, the Requester will have to prove he/she is the policyholder of a Device Cover, Legal Expenses Cover or a holder of Value Added Product/s to which the requested information or records relate. The Requestor may also be required to provide further particulars to prove he/she is a policyholder or to provide an explanation why access to the identified records is required. In instances where the request is made on behalf of another person then the Requester must also submit proof of capacity in which the request is made and authorisation by the owner of the record/information that such record or information should be provided.

**Note: Information will not be furnished unless a person clearly provides sufficient particulars to enable the company to identify the right the Requester is seeking to protect as well as an explanation of why the requested information is required for the exercise or protection of that right.**

The following procedure will be followed by Vodacom Insurance Company (RF) Limited after receipt of the request for access:

- Once a request is made in the prescribed Form C, Vodacom Insurance Company (RF) Limited will send an acknowledgment of receipt within five (5) days of receiving the request
- The Requestor will receive notice from Vodacom Insurance Company (RF) Limited to pay a search fee of R50.00 excluding VAT (if applicable)
- The prescribed fee must be paid before the request is processed
- Payment of this fee should be made as directed by the Head of Vodacom Insurance Company (RF) Limited
- After receiving payment of the search fee Vodacom Insurance Company (RF) Limited will then make a decision in respect of the request and will notify the Requestor of the decision
- Where the request is approved then the Requestor will receive an invoice for payment of the requested documentation (charged at R0.75c per page, excluding VAT)
- Should the request be refused, the Requestor may lodge an application or appeal in accordance with paragraph 11 of the Manual against the refusal of the request or payment of the requested fee and this will be advised in the notice to be sent to the Requestor (in terms of section 56(3) of the PAIA).
- If the request is granted then the Requestor might be required to pay a further access fee for the search, reproduction and preparation of the record as well as for the time that has exceeded the prescribed hours to search and to prepare the record for disclosure to the Requestor (in terms of section 54(6) of the PAIA ).
- The fee schedule can be downloaded from the Department of Justice and Constitutional Development's website at [www.justice.gov.za](http://www.justice.gov.za)

d. Guidance for completing Form C



The Requestor can contact Vodacom Insurance Company (RF) Limited Information Officer at the address as set out in paragraph 5 of the Manual for guidance on how to complete Form C, the documents that need to be submitted or applicable fees.

## 9. Data Subject Participation

POPIA confers the following rights to Data Subjects:

- To withdraw his/her consent at any time, provided that the lawfulness of the processing of personal information before such withdrawal or processing of personal information on the basis of another lawful ground for processing will not be affected;
- Object, any time, to the processing of personal information in the prescribed manner and on reasonable grounds relating to his or her particular situation or for purposes of direct marketing other than direct marketing by means of unsolicited electronic communications;
- Request the Responsible Party to either correct or delete personal information of the Data Subject in its possession or under its control that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, or obtained unlawfully; or  
Destroy or delete a record of personal information about the Data Subject that the Responsible Party is no longer authorised to retain.

## 10. Request Fees

Section 54 of the Act entitles a Private Body to levy a prescribed request fee to a Requester before further processing the request. The fees that may be charged have been published by the Minister of Justice and Constitutional Development and are displayed below.<sup>1</sup>

According to POPIA a Responsible Party is entitled to levy a prescribed fee for the provision of a record Personal Information about the Data Subject in its possession.

1. ACCESS FEES FOR REPRODUCTION		
1.1	For every photocopy of an A4-size page or part thereof	R1.10
1.2	For every photocopy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	R0.75
1.3	For a copy in a computer-readable form on memory stick	R7.50

<sup>1</sup> Government Gazette No. 23119, General Notice No. R187 of 15 February 2002



1.4	For a copy in a computer-readable form on compact disc	R70.00
1.5	For a transcription of visual images for an A4-size page or part thereof	R40.00
1.6	For a copy of visual images	R60.00
1.7	For a transcription of an audio record for an A4-size page or part thereof	R20.00
1.8	For a copy of an audio record	R30.00
2. ACCESS FEE FOR TIME SPENT		
2.1	The time reasonably required to search for the record for disclosure and preparation	R30.00/hr or part thereof
3. REQUEST FEE		
3.1	For a request for access to a record by a person other than a personal Requestor	R50.00
4. DEPOSIT		
4.1	One third of the access fee is payable as a deposit by the Requester	
5. POSTAL FEE		
5.1	When a copy of a record must be posted to the Requestor	R9.75
6. APPEAL FEES		
6.1	For lodging an internal appeal against the refusal of a request for access to a record	R50.00
7. VAT		
7.1	Vodacom Insurance Company (RF) Limited, as a private body registered under the Value Added Tax Act, 1991 will add VAT to all the above-mentioned fees	

## 11. Granting or Refusal of Requests

All requests complying with the requirements set out above will be processed. Vodacom Insurance Company (RF) Limited will give the Requester a written notice of the decision within 30 days after receiving the completed Form C. In case of a request being refused, the notification will include the reasons for the refusal. Vodacom Insurance Company (RF) Limited may extend the 30 day notice period for a further period not exceeding 30 days due to the nature of the request and the amount of time required to gather the requested information. The Requester will however be given notice of the extension prior to the expiry of the 30 day period and provided with reasons for the



extension. If a request for access to Personal Information is made and part of that information may or must be refused in terms of POPIA or PAIA, every other part will be disclosed.

If the request for access is granted, then Vodacom Insurance Company (RF) Limited will advise the Requestor on the following:

- the prescribed fee for accessing the information or documentation
- payable deposit fee and balance outstanding
- the form in which access will be given
- the right to lodge an internal appeal against the access fee to be paid or the form of access to be granted.

If the request for access is refused then Vodacom Insurance Company (RF) Limited will advise the Requestor about the reasons for refusal of access and may advise the Requestor to lodge an application with the Information Regulator against the refusal of the request after the Requestor has exhausted all Vodacom Insurance Company (RF) Limited's internal appeal process.

Chapter 4 of the PAIA stipulates the following grounds for refusing requests for information:

- protection of the privacy of a third party who is a natural person
- protection of commercial information of a third party
- protection of certain confidential information of a third party
- protection of safety of individuals and protection of property
- protection of records privileged from production in legal proceedings
- commercial information of the Private Body
- protection of research information of a third party and of the Private Body.

These grounds of refusal are also endorsed in section 23 of POPIA.

## 12. Appeal/ Lodgment of Complaints

The Act makes provision for the lodgment of a complaint against:

- Access fee charged or the form of access granted
- Refusal of the request to grant access
- Decision to extend the 30 days' period for granting the requested access
- Form in which access is granted

A Requestor aggrieved by Vodacom Insurance Company (RF) Limited's decision or who wishes to lodge a complaint or appeal must follow this process:



A complaint or an internal appeal must:

- be lodged within 30 days after the decision is communicated to the Requestor;
- be delivered or sent to the address, fax or electronic mail address contained in paragraph 5 above;
- identify the subject of the complaint or internal appeal and state the reasons for the complaint or internal appeal;
- be accompanied by the prescribed appeal fee as prescribed in paragraph 10 above;
- specify a postal address, fax number or electronic mail for the return of the decision.

(see Annexure D for the copy of the form to be used in lodging the internal appeal)

Where, in addition to a written reply, the complainant/appellant wishes to be informed of the decision in any other manner he/she/it must state that manner and provide the necessary particulars to be so informed. Where the complaint or internal appeal is lodged after the expiry of the 30 days period the Designated Information Officer, on good cause shown, allow the late lodgment of the complaint or internal appeal.

The complainant/appellant who is not happy with the decision of the internal process may lodge an application with the Information Regulator against the decision made within 30 days after the decision was communicated to him/her/it.

### **13. Other Information as may be Prescribed**

Section 51(1)(f) of the Act grants the Minister powers to publish a notice prescribing any other information that a Private Body will have to disclose.

### **14. Availability of the Manual**

- a) This manual is available for inspection during office hours and at no charge.
- b) Should you wish to obtain a copy of this manual or part thereto such copy can be obtained from either:
  - the address set out in paragraph 5 subject to payment of applicable fees (refer to heading 10); or
  - downloaded from our website at [www.vodacom.co.za](http://www.vodacom.co.za)



## ANNEXURE A: Categories and Types of Information

1.1 Categories and type of records automatically available without having to request access to these records (Section 52(1) of PAIA read with regulation 9A<sup>2</sup> to the PAIA):

The following are categories of records automatically available:

Description of category of records automatically available in terms of section 52(1)(a) of the PAIA	Manner of access to records (Section 52(1)(b))
For inspection in terms of section 52(1)(a)(i)	
Product Information	Soft copy/website
Public Customer Information	Softcopy
Registers	Softcopy
For copying in terms of section 52(1)(a)(ii)	
Annual Reports	Soft copy/website
Financial Statements	Soft copy/website
Available free of charge in terms of section 52(1)(a)(iii)	
Media Releases	Website/Soft copy

1.2 Categories and types of records that can be requested (section 51(1)(e) of the PAIA):

The following are categories of records that can be requested from Vodacom Insurance Company (RF) Limited. Each request for information will be dealt with on a case by case basis and the mere fact that a record is listed below does not mean that access to that record will be granted.

### Requests by Business partners

Information Category	Information Category Description
Commercial agreement with business partners	This is the document, which records the agreement with the business partner, and is the output of contractual negotiations undertaken previously. It is co-owned by the business unit(s) involved and Legal Affairs Department.
Contractual issues with Business Partners	All information related to reaching an agreement with a business partner, for example correspondence and minutes of meetings prior to the actual agreement, including details related to the agreement itself.

<sup>2</sup> Regulations regarding the Promotion of Access to Information Act, as amended, Government Gazette 29914, Government Notice R.466 of 1 June 2007





## Corporate Social Investment

Information Category	Information Category Description
Corporate Social Investment - Application for Funding	This details all Corporate Social Investment applications received for funding by Vodacom Foundation.
Corporate Social Investment – Projects	Details of the projects that have been approved and are underway.
Corporate Social Investment – Vodacom Insurance Company (RF) Limited response	The information relating to process of approval or rejection of the applications received for Corporate Social Investment.

## External Communication

Information Category	Information Category Description
External Publication	All publications for external bodies, includes all press clippings
Press Release/Communiqué	Issuing of media statements, press releases, official speeches etc.
Web and Magazine Content	Content available on Vodacom Insurance Company (RF) Limited internet sites (for e.g. vodacom.net) and magazines (for e.g. Vodacom world Magazine) as well as at POS (Point of Sale) Kiosks (e.g. at Vodacom world).

## Government Protocol

Information Category	Information Category Description
South African Government structure	Details of the structure and holders of the South African government
South African Parliament structure	Details of the structure and holders of the South African parliament
Visiting Foreign Governments structure	Details of the positions held by foreign government visitors to South Africa

## Legal

Information Category	Information Category Description
Finalised litigation	Litigation that has been concluded by court process or mutual consent

## Management

Information Category	Information Category Description
Board reports & meeting minutes	Reports prepared for the board meetings, and the subsequent minutes recording these meetings.
Project Activity and Schedule	Details of projects (tasks, resources, dependencies, durations, etc.)
Project Lifecycle and Macro Plan Information	This records the status and overarching objectives of the project. Project planning is undertaken according to the "Manage by Project" standard and all projects are registered in a project register.



## Regulatory

Information Category	Information Category Description
Compliance certification	Compliance to international standards
Compliance to license	The short-term insurance license in terms of the Short-Term Insurance act 53 of 1998.
Policies and procedures	The documented policies and procedures of Vodacom Insurance Company (RF) Limited's business processes and practices, for example relating to customer complaints.

## Regulatory Submissions

Information Category	Information Category Description
Draft Legislations, Draft Regulations, Policy Directives	Information regarding Vodacom Insurance Company (RF) Limited's position on draft legislation, regulations, and policy directives

## VIP events

Information Category	Information Category Description
VIP event management	Vodacom Insurance Company (RF) Limited Events with business partners and other third parties and including staff functions of a high profile.

## Customer Information

Information Category	Information Category Description
Customer Contract Details	Contract customer details received during application process
Customer Detail	All other customer details recorded during customer creation process, which are not covered by information categories Customer Contract Details and including customer preferences.
Customer Profile	Information relating to the customer profile, for e.g. which services are activated
Payment History	Information relating to payments made.

## Customer Management

Information Category	Information Category Description
Customer Satisfaction Metrics	Research and measurement of customer satisfaction.
Customer Segments/Markets	The categories into which the market (potential customers) and active customers are divided.
Customer Sensitivity Analysis	The information measuring the customers' propensity to churn.



Customer Survey	The information relating to a customer survey (survey, respondents, feedback etc.)
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### Retail account

Information Category	Information Category Description
Account Holder	Information relating to the entity (individual or organisation) to whom the bill is addressed
Account Information	Information about the account (balance, status etc.)
Contract Customer Bill	The billing information prepared for post-paid customers
Contract Payment	Payment details (payment date, amount, method etc.)
Prepaid Customer Account Balance	Details of the prepaid customer's account balance

### Call Centre Management

Information Category	Information Category Description
Call Center Performance	The performance of the call centre in answering and resolving customer enquiries
Call Centre Agent Schedule	The planned and actual schedule of call centre agents (includes bonus schedule).
Call Centre Benchmark Result	The results of special tests (benchmarks) when performance is monitored for specific reasons

### Customer Interaction

Information Category	Information Category Description
Call Centre Call Data	The details of calls handled by the call centre (call centre agent, time, duration, query, etc.)
Customer Complaint	Details of specific customer complaints which are (or have been) communicated to Ombudsman for Short Term Insurance and the National Consumer Commission.
Customer Frequently Asked Questions (FAQ) database	Information on the most frequently asked questions
Customer Inquiry	Details of general customer inquiries
Customer Service Request	The recording of an issue raised by a customer which requires attention.
Outbound Response	Information relating to responses communicated to customers



## Distribution Channel Management

Information Category	Information Category Description
Dealer Promotion	Information relating to dealer promotions

## Distribution Channel Structure

Information Category	Information Category Description
Independent Service Provider	Information about Service Providers who are independent of Vodacom Group (dual SPs)
Outlet	Information about the outlet (location, size, type, etc.)
Retailer	Retailer information
Sales Cluster	The geographic area within South Africa in which a sale took place

## Accounting

Information Category	Information Category Description
Budget	Budget information (amount, code, responsibility)
Cash / Bank Transaction	Information generated by a financial transaction as a result of the flow of information to or from Vodacom Insurance Company (RF) Limited
Financial transactions	Information generated by a financial transaction
General Ledger Account	General Ledger Account information (code, name, responsibility)

## Asset

Information Category	Information Category Description
Asset	All assets, including the financial aspect of IT

## Financial Performance

Information Category	Information Category Description
Financial Management Statistics	The description, definition and measurement of financial metrics which measures the financial performance of the organisation and which are reported in the monthly management report
Financial Target	The planned goal of a financial metric (for example "Earnings before Income Tax, Depreciation and Amortisation")



## Technical Alarm / Event

Information Category	Information Category Description
Information Technology (IT) Alarm and Event	The information relating to an alarm, which is generated, alerting support personnel to a failure (or possible failure) of an element or elements in the IT network.
Information Technology (IT) Equipment Fault History	The history of faults and resolutions relating to items of IT equipment

## Internal Communication

Information Category	Information Category Description
Internal Communiqué	The information contained within any internal communication, via email or physical (paper) distribution.
Policy and Procedure Tracking and Documentation	The dissemination and implementation of policy and procedure information
Reference Material	Reference material used in internal communications
Research Material	Research material used in internal communications

## Organisation Structure and Position

Information Category	Information Category Description
Archive of Senior Management Photographs	Photographs of senior management
Job Profiling	The categorisation of responsibilities associated with an employment position
Organisational Structure	The structure of the organisation into business units, commonly depicted in an organogram. This usually includes the top "n" levels of an organisation, for example the executive directors, name of departments reporting into their business units and position.
Position	The title and responsibilities of employment positions, including information related to the role and current incumbents. This includes information on contractors and other non-permanent staff members.

## Performance and Remuneration

Information Category	Information Category Description
Employee Performance Record	The records relating to the employee performance, for example performance awards
Employee Timesheet Information	The records relating to the working hours' availability of an employee
Payroll	All information related to payment of an employee, for example payment method, bank account details, payment amount, payment date



Information Category	Information Category Description
Salary/Incentive/Bonus	Information related to the "package" of an individual, for example gross salary, PAYE amount etc.

### Personnel Detail

Information Category	Information Category Description
Curriculum Vitae (CV) and Application Detail	Details of applicants for employment, including CV details
Disciplinary Record	Records of disciplinaries, for example, person, reason, status
Employee Lifecycle Information	The information about an employee "life" at Vodacom Insurance Company (RF) Limited, i.e. when joined, promoted, positions held etc.
Employee Personal Detail	Personal details kept on employees, for example, next of kin

### Personnel Development

Information Category	Information Category Description
Employee Promotion criteria	The criteria for promotion
Skill Level	The skills required for positions
Training Event / Course	Details of training courses available and held

### Facility

Information Category	Information Category Description
Bookings & appointments	Details of bookings for infrastructure elements, for example parking for visitors or video conference facilities
Facility/Security Access Record	Records of access to buildings by individuals
Loan Item	Items loaned to employees, for example training material
Office Layout and Maintenance	Details on office layout and maintenance performed, for example air-conditioning maintenance

### Audit Information

Information Category	Information Category Description
Inspection/Audit Result	Results of inspections and audits
Risk and Control	Details of known risks and measures to control those risks



## Contract/SLA Management

Information Category	Information Category Description
Service Level Agreement	The details of service levels agreed between two parties.
Service Level Rating	The measurement of a service level's performance.
Supplier and Partner Contract/Agreement	The contract between a supplier and/or a business partner.

## Procurement

Information Category	Information Category Description
Information Service Provider	The information about an information service provider.
Manufacturer	Details related to a manufacturer who produces goods for Vodacom Insurance Company (RF) Limited, for example Name, Address, Goods produced
Procurement decisions	Information related to procurement decisions
Request for Information (RFI)	Details contained within a request for information document, for example services and deliverables required
Statement of Work	The details related to a Statement of Work, including the deliverable specifications, due date, price, risks etc.
Supplier	Details relating to Supplier for example, registered name, banking details, status
Supplier demographics	Demographics of suppliers, with specific attention to the Historically Disadvantaged Individual (HDI) indicators
Supplier Invoice	Details related to an invoice received from suppliers
Vodacom Insurance Company (RF) Limited Purchase Order	Details related to the purchase order process which controls the operational and capital expenditure of Vodacom Insurance Company (RF) Limited

## Production

Information Category	Information Category Description
Operator Schedule	Details of Production and operators' schedules.
Production Capacity and Throughput	Details of maximum production capability and current measurement of production.
Production Schedule	Details of scheduled production.

## Product/Service Management

Information Category	Information Category Description
Bearer Service	A bearer service is a basic service that provides the capabilities for the transmission of information between user-network interfaces.



Information Category	Information Category Description
Brand promotion	Information about promotions on Vodacom Insurance Company (RF) Limited brands, including venue, date, format, leaflets, competition entry forms.
Brand tracking & research	Research and measurement of Vodacom Insurance Company (RF) Limited 's brands, done formally quarterly.
Price List	Details of the available insurance product plans.
Product Configuration	Covered in the tariff and product configuration management, which covers product planning, designing, packaging, technical development, and supply for a product.
Product Launch	Information related to the launch of a new or revamped product
Product Life Cycle	The product life cycle is a sequence of stages (status) a product moves through from inception to decommissioning.
Product Performance Information	The metrics and performance of products
Product Specification	The specifications of a product
Sponsorships	Information about the sponsorships Vodacom Insurance Company (RF) Limited is involved with which leverage the brand. These include Sport, cultural, CSR and broadcast.
Value Added Service	The information about value added services.

### Sales Management

Information Category	Information Category Description
Advertisements and Promotions	Information related to advertising schedules, standards & content, as well as management of advertising agencies
Commission	Information on the commission a distribution channel receives for customer transactions.
Incentive and Target	Information on the incentives and targets a distribution channel receives for customer transactions.
Sales Figure and Target	Information on the actual sales as well as the target sales figures for the distribution channels

### Legal & Criminal

Information Category	Information Category Description
Procedures & policies regarding false and fraudulent insurance claims	The information on the specific procedures and policies relating to the recording or handling of false and fraudulent insurance claims.
Suspected Fraud Alert	The information on alerts, which are triggered when fraud is suspected.

1.3 Processing Manual required in terms of Section 17 of POPIA





In accordance with the requirements of section 17 of POPIA, insofar as the processing of personal information is concerned, Vodacom Insurance Company (RF) Limited is required to provide the following:

- the purpose of the processing;
- a description of the categories of data subjects and of the information or categories of information relating thereto;
- the recipients or categories of recipients to whom the personal information may be supplied;
- planned transborder flows of personal information; and
- a general description allowing a preliminary assessment of the suitability of the information security measures to be implemented by the responsible party to ensure the confidentiality integrity and availability of the information which is to be processed.

Kindly refer to the attached document titled "POPIA Processing Manual" which contains the aforementioned information, as it pertains to the processing of personal information.



## ANNEXURE B: PRESCRIBED FORM C

### REQUEST FOR ACCESS TO RECORDS HELD BY VODACOM INSURANCE COMPANY (RF) LIMITED

*(Section 53(1) of the Promotion of Access to Information Act, 2 of 2000)*

#### A. Particulars of Vodacom Insurance Company (RF) Limited

The Head: Vodacom Insurance Company (RF) Limited

Vodacom Corporate Park

082 Vodacom Boulevard

Midrand

1685

or

Private bag x 9904

Sandton

2146

Telephone number: 011 653 5000

Email: Lifecompliance@vodacom.co.za

#### B. Particulars of person requesting access to the record

- |   |
|---|
| <p>a) <i>The particulars of the person who requests access to the record must be given below</i></p> <p>b) <i>The address and/or fax number in the Republic to which the information is to be sent must be given</i></p> <p>c) <i>Proof of the capacity in which the request is made, if applicable, must be attached</i></p> |
|---|

Full names and surname: \_\_\_\_\_

Identity number: \_\_\_\_\_

Postal address: \_\_\_\_\_

Fax number: \_\_\_\_\_

Telephone number: \_\_\_\_\_



E-mail address: \_\_\_\_\_

Capacity in which request is made, when made on behalf of another person:

**C. Particulars of person on whose behalf request is made**

*This section must be completed ONLY if a request for information is made on behalf of another person*

Full names and surname: \_\_\_\_\_

Identity number / Company Registration Number: \_\_\_\_\_

**D. Particulars of record**

*a) 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.*  
*b) 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***

1) Description of record or relevant part of the record:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

2. Reference number, if available: \_\_\_\_\_

3. Any further particulars of record: \_\_\_\_\_

\_\_\_\_\_

**E. Fees**

*a) A request for access to a record, other than a record containing personal information about yourself, will be processed only after a **request fee** has been paid*  
*b) You will be notified of the amount required to be paid as the request fee*  
*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 such record*



d) *If you qualify for exemption of the payment of any fee, please state the reason for exemption.*

Reason for exemption from payment of fees:

**F. Form of access to record**

*If you are prevented by a disability to read, view or listen to the record in the form of access provided for in 1 to 4 hereunder, state your disability and indicate in which form the record is required.*

Disability:	Form in which record is required:
<p><i>Mark the appropriate box with an X.</i></p> <p><i>NOTES:</i></p> <p><i>(a) Compliance with your request in the specified form may depend on the form in which the record is available.</i></p> <p><i>(b) Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form.</i></p> <p><i>(c) The fee payable for access to the record, if any, will be determined partly by the form in which access is requested.</i></p>	

**1. If the record is in written or printed form:**

<input type="checkbox"/>	copy of record*	<input type="checkbox"/>	inspection of record
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**2. If record consists of visual images**

(this includes photographs, slides, video recordings, computer-generated images, sketches, etc.):

<input type="checkbox"/>	view the images	<input type="checkbox"/>	copy of the images*	<input type="checkbox"/>	transcription of the images*
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**3. If record consists of recorded words or information which can be reproduced in sound:**

<input type="checkbox"/>	listen to the soundtrack (audio cassette)	<input type="checkbox"/>	transcription of soundtrack*  (written or printed document)
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4. If record is held on computer or in an electronic or machine-readable form:

	printed copy of record*		printed copy of information derived from the record*		copy in computer readable form* (memory stick or compact disc)	
*If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you?  Postage is payable.					YES	NO

G. 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**

1. Indicate which right is to be exercised or protected:

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

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**H. Notice of decision regarding request for access**

*You will be notified in writing whether your request has been approved/ denied. If you wish to be informed in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request.*

How would you prefer to be informed of the decision regarding your request for access to the record?

\_\_\_\_\_

\_\_\_\_\_

Signed at \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ 20

\_\_\_\_\_  
SIGNATURE OF REQUESTER / PERSON  
ON WHOSE BEHALF THE REQUEST IS MADE



**AFFIDAVIT**

I, the undersigned ..... (*Please insert full names*) do hereby make oath and say:

1.

I am an adult male/female residing at ..... I am the requestor in terms of the Promotion of Access to Information Act, No 2 of 2000.

2.

The facts herein contained are true and correct and within my personal knowledge, unless indicated to the contrary, and are in all respects true correct.

3.

I am the (please select one of the options):

- (a) policyholder of Vodacom Insurance Company (RF) Limited Device Cover
- (b) policyholder of Vodacom Insurance Company (RF) Limited Legal Expenses Cover
- (c) holder of Vodacom Insurance Company (RF) Limited Value-Added Product/s

I am duly authorised to lodge this request in terms of the Promotion of Access to Information Act, No 2 of 2000.

4.

The information requested pertains to information/records on Insurance Policy cover number \_\_\_\_\_ and am duly authorised to lodge my request in terms of the Promotion of Access to Information Act, No 2 of 2000.



5.

My Identity/passport number is ..... and I attach hereby a certified copy of my identity/passport document.

6.

I am the holder of Vodacom Insurance Company (RF) Limited products number \_\_\_\_\_ and I am duly authorised to consent to a third party requesting information on my behalf in terms of the Promotion of Access to Information Act 2 of 2000.

7.

I hereby confirm that I have given consent to \_\_\_\_\_ to request and receive information (which is more fully detailed in the document attached hereto and marked Annexure \_\_\_\_\_ which has been initialled by me for purpose of identification and which is in the prescribed 6 hours allowed by Vodacom) from Information Officer requested on my behalf in terms of the Promotion of Access to Information Act 2 of 2000. Furthermore, I hereby waive any rights that I may have against Vodacom Insurance Company (RF) Limited in regard to any damages that I may suffer arising from the release by the Information Officer to \_\_\_\_\_ in the information referred to in Annexure \_\_\_\_\_

8.

I am aware that I could be prosecuted for making a statement knowing it might be used in court proceedings and known by me to be false and intended to mislead.





I know and understand the contents of this statement. I have no objections in taking the prescribed oath. I consider the prescribed oath to be binding on my conscience.

SIGNED AT \_\_\_\_\_ ON THIS \_\_\_\_\_ DAY OF \_\_\_\_\_ 20\_\_\_\_

\_\_\_\_\_  
*Deponent (Signature of person  
swearing or affirming the statement)*

I certify that the deponent has acknowledged that he/she knows and understands the contents of this affidavit which was signed and sworn to, before me at this \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_ and that he/she has no objection to taking the prescribed oath.

\_\_\_\_\_  
SIGNATURE Commissioner of Oaths or other  
official before whom the statement is  
sworn/affirmed)

\_\_\_\_\_  
Full First Names and Surname

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_  
Business Address (Street Address)



## ANNEXURE C: SOME OF THE LEGISLATIONS IN TERMS OF WHICH RECORDS ARE KEPT

Vodacom Insurance Company (RF) Limited keeps information and/or documents in accordance with the following legislation (This is not an exhaustive list):

Legislation	Type of information to be retained
a) Basic Conditions of Employment Act No. 75 of 1997	The Act requires employers to keep records of information containing the personal details of all its employees, working times and remuneration package.
b) Broad Based Black Economic Empowerment Act No. 53 of 2003 ("BBBEE")	The BBBEE Act has as one of its objectives the promotion of economic transformation in order to enable meaningful participation of black people in the mainstream economy. It is expected that companies should keep records of activities undertaken in order to promote economic transformation and meaningful participation of black people in the mainstream economy.
c) Companies Act No. 71 of 2008	The Act requires all company documents and records to be kept in a written format. Companies are also expected to maintain memorandum of incorporation and a record of their directors.
d) Compensation for Occupational Injuries and Health Diseases Act No. 130 of 1993	Employers are expected to keep a register, employee record or reproduction of same relating of wages, time worked, payment for piece work and overtime
e) Consumer Protection Act No. 68 of 2008	The Act applies to all transactions in South Africa and is aimed at promoting and protecting the economic interests of consumers. The Act however does not deal with consumer personal information nor impose obligations on businesses in respect of treatment and/or protection of such information.
f) Criminal Procedure act No. 51 of 1977	The Act makes provision for the admissibility of documents as evidence where such documents were compiled in the course of trade or business by persons who have personal knowledge of matters contained in the document.
g) Electronic Communications Act No. 36 of 2005	There are no specific requirements on the type of information to be retained. However, it is expected that companies protect confidentiality of customer and to use it only for purpose authorized by the customer or in terms of the law.
h) Electronic Communications and Transactions Act No. 25 of 2002	The Act requires that information emanating from electronic transactions only be collected, collated, processed, and disclosed with customer's consent. Further, the purpose for which information is collected must be disclosed to the customer and must only be used for that purpose unless customer consents otherwise
i) Employment Equity Act No. 55 of 1998	Employers are required to maintain records relating to the workforce, employment equity plans and other relevant records
j) Financial Advisory and Intermediary Services Act No. 37 of 2003	An authorized financial service provider is required to maintain records relating to:



	<ul style="list-style-type: none"> <li>▪ premature cancellation of transactions or financial products</li> <li>▪ complaints received and an indication whether such complaints were resolved</li> <li>▪ cases of non-compliance with the Act and reasons for such non-compliance</li> </ul>
k) Financial Intelligence and Centre Act No. 38 of 2001	<p>The Act requires that prior to establishing a relationship with a client Intelligence Centre's should collect information relating to</p> <ul style="list-style-type: none"> <li>▪ Client's Identity Document</li> <li>▪ ID of a person on whose behalf the client is acting and proof of authority</li> <li>▪ Nature of business relationship/transaction</li> <li>▪ Amounts involved</li> <li>▪ Details of employee who captured info on behalf of company</li> </ul>
l) Insolvency Act No. 24 of 1936	The Act consolidates and amends the law relating to insolvent persons and to their estates
m) Labour Relations Act No. 66 of 1995	The Act requires employers to keep records of disciplinary transgressions against employees, actions taken and reasons for the action
n) Long Term Insurance Act No. 52 of 1998	Under the Act the policyholder, and the person who entered into the long-term policy, are entitled, against payment of a prescribed fee to be provided, upon request, with a copy of the policy agreement.
o) National Credit Act No. 34 of 2005	A credit provider is expected to maintain records of all applications for credit, credit agreements and credit accounts in the prescribed manner and form and for the prescribed time.
p) Occupational Health and Safety Act No. 85 of 1993	Employers are required to keep records relating to the health and safety of persons in the workplace
q) Pension Funds Act 24 of 1956	Every fund is expected to maintain books of account and other records as may be necessary for the purpose of the fund. All the money and assets belonging to the fund may be kept in the name of the pension fund by other institutions subject to conditions determined by the Minister.
r) Policyholder Protection Rules for Long-Term Insurance and Short-Term Insurance, 2017	<p>Insurers are required to keep records relating to:</p> <ul style="list-style-type: none"> <li>▪ insurance policy related communications with a policyholder; and</li> <li>▪ transaction documentation (including the insurance policy) and all other material documentation relating to the policy and the policyholder.</li> </ul>
s) Prevention and Combating of Corrupt Activities Act No. 12 of 2004	The Act provides for the strengthening of measures to prevent and combat corruption and corrupt activities. To this end companies are expected to keep records relating to any offer of improper gratification relating to the procurement or execution of contracts or employment relationship.
t) Prevention of Organized Crime Act No. 121 of 1998	The Act requires that any person who is aware of criminal activities is obliged to report them to the authorities. The duty of confidentiality or other restrictions on the disclosure of information, whether



	imposed by law, the common law or by agreement does not affect the obligation to report or disclose information or to permit access to any registers, records or other documents unless that obligation of confidentiality relates to attorney-client privilege.
u) Protection of Personal Information Act No. 4 of 2013	The Act promotes the protection of personal information processed by public and private Bodies.
v) Public Prosecution Authority Act No. 32 of 1998	The Act regulates the establishment of a single National Prosecuting Authority. To this end the Director-General: Justice is required to cause the necessary accounting and other related records to be kept by the National Prosecuting Authority.
w) Regulation of Interception of Communications and Provision of Communication Related Information Act No. 70 of 2002 ("RICA")	<p>The Act requires the following information to be stored in respect of all customers:</p> <ul style="list-style-type: none"> <li>▪ Name, surname, ID number, MSISDN and one address</li> <li>▪ For businesses: name, registration number, business address, name and surname of business representative, his or her ID number as well as the address</li> </ul> <p>The above information should be stored in a separate RICA database which complies with specific security requirements prescribed under the Act and is used only for RICA purposes</p>
x) Short Term Insurance Act No. 53 of 1998	Under the Act the policyholder, and the person who entered into the short-term policy, are entitled, against payment of a prescribed fee to be provided, upon request, with a copy of the policy agreement.
y) Skills Development Act no. 97 of 1998	The Act requires, amongst other things, that employers who commence with learnership programmes to enter into learnership agreements with the learner concerned specifying the learnership to be provided, the duration of the learnership and an undertaking to provide the learner with the specified practical experience. To comply with this requirement Employers are expected to keep records of all learnership agreements.
z) Skills Development Levies Act No. 9 of 1999	Every employer is expected to make payments towards the skills development levy at a rate of 1% of the leviable amount. Records detailing payments made by the Employer are expected to be kept.
aa) Unemployment Insurance Act No. 30 of 1996	An Employer is expected to keep records relating to payment of contributions to the Unemployment Insurance Fund relating to: illness, maternity and for dependents. The Act does however, subject to the provisions of the Promotion of Access to Information Act, No. 2 of 2000, prohibits the disclosure of information obtained in the performance of functions under the Act.



**ANNEXURE D: NOTICE OF INTERNAL APPEAL**

**A. Particulars of the Head of Vodacom Insurance Company (RF) Limited**

**The Head of Vodacom Insurance Company (RF) Limited**

Vodacom Corporate Park

082 Vodacom Boulevard

Midrand

1685

or

Private bag x 9904

Sandton

2146

Telephone number: 011 653 5000

Email: Lifecompliance@vodacom.co.za

**B. Particulars of the Complainant /Appellant**

- (a) Details of the complainant or person who lodges the internal appeal must be given below.
- (b) Proof of the capacity in which the complaint/appeal is lodged, if applicable, must be attached.
- (c) If the complainant/appellant is a third party and not a person who originally requested the information, the particulars of the requestor must be given in paragraph C below.

Full names and surname: \_\_\_\_\_

\_\_\_\_\_

Identity number: \_\_\_\_\_

Postal Address: \_\_\_\_\_

\_\_\_\_\_



Telephone number: \_\_\_\_\_ Cellphone number: \_\_\_\_\_

Fax: \_\_\_\_\_ E-mail Address: \_\_\_\_\_

### C. Particulars of the Requestor

This section must be completed ONLY if a third party (other than the requestor) lodged the complaint/internal appeal

Full names and surname: \_\_\_\_\_

Identity number: \_\_\_\_\_

### D. The decision against which the complaint/internal appeal is lodged

Mark the decision against which the appeal is lodged with an X in the appropriate box	
	Refusal of request for access
	Decision regarding fees prescribed in terms of section 54 of the PAIA
	Decision regarding the extension of the period within which the request must be dealt with section 57(1) of the PAIA
	Decision to grant request for access
	Other

### E. Grounds for complaint/appeal

If the provided space is inadequate, please continue on a separate page and attach it to this form. **You must initial and sign all additional pages.**

State the ground on which the complaint/appeal is based: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_



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State any other information that may be relevant in considering the appeal: \_\_\_\_\_

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**F. Notice of decision on complaint/appeal**

You will be notified in writing of the decision on your complaint/internal appeal. If you wish to be informed in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request

State the manner: \_\_\_\_\_

Particulars of the manner: \_\_\_\_\_

---

Signed at \_\_\_\_\_ this \_\_\_\_ day of \_\_\_\_\_ 20 \_\_\_\_

---

Signature of the complainant/appellant

<p><b>FOR INTERNAL USE ONLY</b></p> <p>Appeal received on _____ (date) by _____</p> <p>_____</p> <p>(Name and Surname of the person receiving the complaint/appeal)</p> <p><b>Outcome of the complaint/Appeal</b></p> <p>New Decision: _____</p> <p>_____</p>
---



<hr/> <hr/> <hr/> <hr/>	
<hr/>	<hr/>
DATE	SIGNATURE OF THE HEAD OF VODACOM
INSURANCE COMPANY (RF) LIMITED	





Revision History		
Date	Version	Summary of changes since the last version
Never published	1	Original