



## 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'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) Ltd ("**VIC**") and the release of any such information or records of VIC's directors, officers, employees, customers, 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 Protection of Personal Information Act No.4 of 2013 ("**POPIA**").

### Application

This Manual applies to information and records owned, held by or otherwise under the control of VIC 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 VIC;
- set out the procedure for requesting information or records in terms of the PAIA and the 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
- remedies applicable to Requesters.



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## 1 Introduction

### 1.1 Purpose of the PAIA Manual

Section 51 of the PAIA requires a Private Body to compile an Access to Information Manual (“**Manual**”) which sets out the procedure and requirements to be adhered to in seeking to obtain access to information held by that Private Body. The objective of the Act as amended by section 110 of POPIA is to give effect to the constitutional right of access to information outlined in section 32 of the Constitution of the Republic of South Africa.

The purpose of this Manual is to outline:

- a non-exhaustive list of the type and categories of records held by VIC, including categories of records available without having to submit a formal PAIA request;
- the process to submit requests for access to information;
- the grounds for refusal of access to information;
- descriptions of records which are available in accordance with any other legislation;
- relevant contact details of the Information Officer;
- description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it; and
- the Processing of Personal Information in terms of POPIA.

### 1.2 Contact Details for Access to Information

#### 1.2.1 Information Officer and Deputy Information Officer Details

Company Registration: VIC (Pty) Ltd	2011/117744/06
Managing Director/Information Officer	Mr. Jacques Du Preez
Deputy Information Officer	Mr. Reece Westcott
Street Address	Vodacom Corporate Park, 082 Vodacom Boulevard, Midrand, 1685
Postal Address	Private Bag X9904, Sandton, 2146
Telephone	011 653 5734
Website	<a href="http://www.vodacom.co.za">www.vodacom.co.za</a>
E mail	<a href="mailto:Lifecompliance@vodacom.co.za">Lifecompliance@vodacom.co.za</a>



## 1.2.2 Contact Details for Access to Information

In order to ensure that VIC complies with PAIA and POPIA, the following entry points have been designated for access to information requests:

### a) Are you requesting a record or description of your Personal Information held by VIC?

All Data Subjects are afforded the right to access their own Personal Information as may be retained in any records of a Responsible Party. In order to request access to the Personal Information in VIC's records, kindly channel all requests to the Information Officer of VIC, whose details are listed below. Please note that you may be requested to provide adequate proof of identification before processing any request for access. As will be further mentioned below, please also note that there may be specific costs associated with retrieval of the requested information from VIC's records. You will be informed if such costs apply to your request. Please follow the Request Procedure outlined in paragraph 7 to access your own Personal Information records.

Addressed to VIC's Information Officer / Deputy Information Officer	Information Officer: Mr. Jacques Du Preez Deputy Information Officer: Mr. Reece Westcott
Physical Address	Vodacom Corporate Park, 082 Vodacom Boulevard, Midrand, 1685
Postal Address	Private Bag X 9904, Sandton, 2146
Telephone	011 653 5000
E mail	<a href="mailto:Lifecompliance@vodacom.co.za">Lifecompliance@vodacom.co.za</a>

Before submitting an access request relating to your own Personal Information, we urge any Data Subject who is a current customer/policyholder of a VIC product or service to consider whether other mechanisms for receiving their information are available. All VIC customers/policyholders are allowed to access their own product/service related information (which may also include Personal Information) without lodging a formal access request in terms of paragraph 7 below (subject to providing the requisite proof of identification). The information a customer has access to includes, but is not limited to:

- Policy documentation;
- Product/service information;
- Personal details related to policy/product/service registration; and/or
- Account information.



As a current customer/policyholder, please consider using the contact details listed on our respective product pages here:

- [Device Insurance](#);
- [Legal Assist](#); and/or
- [Vodasure Health](#).

b) Are you requesting information belonging to another person or any other records that are not classified as your own Personal Information?

In order to request other records that are not classified as your own Personal Information, please contact Vodacom Law Enforcement Agency (“LEA”) using the details outlined below. Please follow the Request Procedure outlined in paragraph 7 below.

Physical Address	Vodacom Law Enforcement Agency (LEA), 082 Vodacom Boulevard, Vodacom Valley, Midrand, 1685
Postal Address	Vodacom Law Enforcement Agency (LEA), Private Bag X9904, Sandton, 2146
Telephone	087 289 6450 / 087 289 3501
Standby nr	082 537 6618
E mail	<a href="mailto:pnemolea@vodacom.co.za">pnemolea@vodacom.co.za</a>

### 1.3 Availability of the Manual

A copy of the Manual is available:

- on our product website at <https://www.vodacom.co.za/vodacom/services/insurance/device-insurance?icmp=Home/Menu/Insurance/Browse/P1/DeviceInsurance>.
- head office of VIC at the address outlined in paragraph 1.2 above, for public inspection during normal business hours at no charge; and
- to any person upon request and upon the payment of a reasonable amount.

A fee for a copy of the Manual, shall be payable per each A4-size photocopy made in line with prescribed fee outlined in paragraph 8.

VIC will on a regular basis update this manual, and the updated Manual will be published on the website.



## 2 Description of the PAIA Guide developed by the Information Regulator

The Information Regulator (“**Regulator**”) has in terms of section 10(1) of PAIA, as amended, updated, and made available the revised PAIA Guide (“**Guide**”) which provides information and guidance that is needed by any person who wishes to exercise any right contemplated in the PAIA and POPIA. The Guide has been published in various languages on the Regulator's website –

- The English version of the Guide is accessible [here](#);
- The isiXhosa version of the Guide is accessible [here](#); and
- The isiZulu version of the Guide is accessible [here](#)

Any questions or queries relating to the Guide published by the Information Regulator must be addressed to:

Physical Address	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001.
Postal Address	P.O Box 31533, Braamfontein, Johannesburg, 2017
Phone	010 023 5200
Website	<a href="https://inforegulator.org.za">https://inforegulator.org.za</a>
E mail	<a href="mailto:enquiries@inforegulator.org.za">enquiries@inforegulator.org.za</a>

## 3 Definitions

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

- 3.1 “**Data Subject**” means the person to whom Personal Information relates.
- 3.2 “**Information Officer**” means the Head of VIC, equivalent officer, duly authorised person or any person who is acting as such as contemplated in section 1 of the Act.
- 3.3 “**Minister**” means the Minister of Justice and Correctional Services.
- 3.4 “**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.

3.5 **“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.

3.6 **“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.

3.7 **“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.

3.6 **“Requester”** in relation to a private body 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 any person acting on behalf of that person.

## 4 Overview of Structure and Function of VIC

As a wholly owned subsidiary of Vodacom Financial Services (Pty) Ltd, VIC is a licensed short-term (non-life) insurance provider whose main line of business involves the provision of both short-term insurance products such as, *inter alia*, ‘Device Insurance’ along with a host of complimentary Value Added Services (“VAS”) such as, *inter alia*, ‘Vodacom Hero Assist’.



VIC designs its products and services in order to foster financial inclusion within the South African insurance sector. Enhancing financial inclusion within the short term insurance market is a key focus of VIC. When combined with innovative technologies, VIC ensures its customers and policyholders are afforded the best possible service offerings in the market.

## 5 Categories of Records held by VIC

The categories of information listed herein are not exhaustive but are merely meant to give a broad indication of the information subjects and categories held by VIC, without specification. A category may therefore contain sub-categories and sub-sets of information, which are not specifically listed.

### 5.1 Categories of records automatically available

In addition to the records of information that are automatically available to existing VIC customer/policyholders as outlined in paragraph 1.2.2 above, the following categories of information are automatically available without having to request access to these records:

Description of category of records automatically available	Manner of access to records
Product Information	Soft copy/website
Published Annual Reports	Soft copy/website
Published Financial Statements	Soft copy/website
Media Releases, Published events	Website/Soft copy

*For a full overview of all records that are automatically available, kindly peruse the contents of **ANNEXURE C: RECORDS THAT ARE AUTOMATICALLY AVAILABLE TO EXISTING VIC CUSTOMERS/POLICYHOLDERS/DATA SUBJECTS** attached hereto below.*

### 5.2 Categories of records that are not readily available

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. Please note that the below list is not exhaustive.

Subject	Categories of Records
Management/Governance	Board/Governance committee reports and meeting minutes
	Strategic Plan, Annual Performance Plan.
	Legal records not in the public domain
	Organisational structure and positions
	Internal Policies, Standards and Procedures





Human Resources	Employee and non-employee records (employment contracts, performance, payroll and remuneration, disciplinary, training, job application details, education, employee onboarding records).
Customer (Policyholder)	Policyholder onboarding information ('Know Your Customer' information)
	Dependent / Beneficiary information
	Policyholder agreements and policy documents
	Claims information
	Employment information
	Device information
	Bank account details for billing purposes
	Policyholder profile records
	Premium information
	Policyholder correspondence information
	Policyholder rewards, benefits and/or VAS information
Policyholder Interactions	Call Centre Recordings
	Policyholder complaints, requests, and enquiries
Accounting	Records relating to the account holders (policyholder transactions, invoices, payment information, contracts, authentication records)
Supply Chain Management	Third party onboarding records
	Responses to tenders and contract records
	Records of agreements/contracts, Service level agreements (SLA's), Invoice records

### 5.3 Description of the records which are available in accordance with any other legislation

Please see Annexure B for a description of the records which are created as a result of legislation applicable to VIC. Please note that these records are not readily available, and the Requester must go through the process outlined in paragraph 1.2.2.

## 6 Processing of Personal Information

**Note:** Please visit the VIC Privacy Notice on <https://www.vodacom.co.za/vodacom/terms/privacy-policy/insurance-company> for a more detailed description of how VIC Processes the Personal Information of its Data Subjects.

### 6.1 Purpose of Processing Personal Information of Data Subjects by VIC

VIC will process the Personal Information of Data Subjects pursuant to:



- Its obligations under a contract/agreement with the Data Subject or to enter into the contract/agreement. For example –
  - to fulfil any claim by a Data Subject pursuant to their insurance policy with VIC;
  - to fulfil any obligation in terms of an employment contract between VIC and a Data Subject; or
  - to fulfil any obligation in terms of an agreement between VIC and a third party service provider.
- VIC's legitimate business interests, for example, fraud prevention, prevention of tax evasion and financial crime, maintaining the security of its network and services, direct marketing, and the improvement of services.
- Protecting a Data Subject's legitimate interests - for example, providing notifications regarding policy changes, emergency services, and/or fraud prevention.
- Compliance with any mandatory legal obligations, including for example, Processing Personal Information pursuant to legislation such as, *inter alia*, the Financial Intelligence Centre Act, 38 of 2001 (FICA), the Financial Sector Regulation Act 9 of 2017, the Electronic Communications and Transactions Act, 2002 (ECTA), the Insurance Act 18 of 2017, the Consumer Protection Act, 2008 (CPA), PAIA, and/or the Cybercrimes Act, 2020.
- The Data Subject's express consent where VIC does not rely on another legal basis (referred to above). The Data Subject is always informed that they are free to withdraw their consent at any time. This is relayed to the Data Subject when they give their consent.

The purpose for which Personal Information is Processed by VIC will depend on the nature of the services or products being provided to the Data Subjects. Below is a non-exhaustive list of some purposes for VIC's Processing Personal Information:

- to provide Data Subjects with their policy or service (VAS) benefits;
- to bill/ invoice Data Subjects for using VIC's products and services;
- to contact Data Subjects if the billing information they provided with is about to expire or VIC is not able to take payment of a premium;
- to respond to any claims, questions or concerns about its products or services;
- to fulfil any regulatory obligation imposed on VIC through the provision of financial services and/or products;
- for employment purposes;
- managing third party relationships;
- marketing and tailoring products or services to Data Subjects;



- to contact Data Subjects with customer service messages to keep them updated with current information about products and services they have taken. For example, changes to our terms and conditions, privacy notice, premium structure etc.;
- performing sanction screening, fraud prevention or security monitoring;
- to investigate the legitimacy of claims related to VIC's policies or services; and/or
- for research and analytics.

## 6.2 Categories of Data Subjects and their Personal Information

VIC holds information and records relating to the following Data Subjects. Please note that this list is non-exhaustive:

- employees/personnel of VIC;
- clients/customers/policyholders of VIC;
- beneficiaries of policyholders;
- any third party and/or supplier with whom VIC conducts its business;
- contractors/consultants of VIC;
- designated partners and/or agents of VIC; and/or
- Requesters in terms of PAIA and POPIA.

The categories of Personal Information that VIC processes of the Data Subjects defined below includes the following:

- Full names, address, phone and/or mobile number, date of birth, gender, information about their property or household, and email address.
- Credit or debit card information - information about a Data Subject's bank account and other banking information for fraud and premium collection purposes.
- Claims data - this is the Personal Information VIC might Process pursuant to fulfilling a policy claim. For example, police reports for stolen devices etc.
- Location data - this can be precise where it uses Global Positioning System (GPS) data or by identifying nearby mobile phone and Wi-Fi hotspots and the Data Subject enables location-based services or features. It can also be less precise where, for example, a location is derived from Data Subject's IP address or data such as a post code or name of a town or city.
- Correspondence - such as a note or recording of a call Data Subjects make to one of its contact centres, a Live Chat, an email or letter sent, or other records of any contact with VIC.



- Account information - such as dates of premium payments for example.
- Credential information – VIC collects passwords, hints and similar security information used for authentication and access to product and service account pages.
- Preferences for particular products, services and lifestyle activities.
- Photographs and images - when providing evidence in support of a policy claim or attending any of VIC's events or functions or accessing premises with surveillance cameras.
- Information obtained from other sources, such as sanction and fraud-prevention agencies, and from other data providers.

### 6.3 The recipients or categories of recipients to whom the Personal Information may be supplied by VIC

VIC may supply information or records of information to the following categories of recipients:

- its employees as part of executing its business functions;
- statutory oversight bodies, regulators (such as the Information Regulator), law enforcement agencies or judicial commissions of enquiry making a request for information;
- any court, administrative or judicial forum, arbitration, statutory commission, or ombudsman making a request for data or discovery in terms of the applicable rules;
- the South African Revenue Services, or another similar authority;
- emergency services personnel (if the Data Subject make an emergency call and has subscribed to VIC's respective VAS), including their approximate location;
- anyone making a successful application for access in terms of PAIA, to the extent that such access is permitted in terms of PAIA, as amended by POPIA,;
- claims investigation officers/personnel;
- any third party contractor, service provider and/or supplier with whom VIC conducts its business;
- VIC's designated and registered/authorised partners and agents;
- third-parties that we use to provide you with marketing and advertisements; and
- companies in the Vodacom and Vodafone Group.



## 6.4 Planned trans-border flows of Personal Information

VIC may transfer Personal Information of Data Subjects to the Vodafone group companies and/or authorised third parties beyond the borders of the countries to achieve a defined purpose, including the achievement of its business functions.

VIC will only engage in the cross-border transfer of information if one of the following conditions are met and as approved by the Information Officer:

- The recipient is subject to existing legislation in his /her/it's country, a binding corporate or 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 Data Subject has consented to such cross-border transfer;
- The transfer is necessary for the conclusion and/or performance of a contract between VIC 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 VIC and the relevant VIC 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. VIC will ensure the adequate protection of your Personal Information where such disclosures are required.

## 6.5 General Description of Information Security Measures

- VIC is committed to continuously implement security safeguards to protect Personal Information. For this reason, VIC has specialised security teams that constantly review and improve its measures to secure the integrity and confidentiality of 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 VIC has an agreement with another organisation to provide services on its behalf, VIC will take reasonable steps to ensure that they have appropriate security measures in place that are substantially similar to the security measures implemented by VIC. These organisations will not be entitled to use Personal Information



for their own purposes. If necessary, the security teams will conduct an audit on them to ensure they meet VIC's security requirements.

- VIC has implemented various information security measures such as, but not limited to:
  - Firewall and network endpoint protection;
  - Antivirus and Multifactor Authentication;
  - A dedicated support network of cyber security professionals;
  - Encryption and/or similar cryptographic technologies and techniques;
  - Access control methodologies based on user roles and security clearance levels;
  - Confidentiality protocols that apply to all internal documents and correspondence; and/or
  - Disaster Recovery and Business Continuity Management Protocols and Procedures.

## 7 Request Procedure

### 7.1 Procedure to be followed by the Requester

- A request for access to a record must be made in a prescribed Form 2 (Annexure A) to VIC at its address, fax number, or electronic email address outlined in paragraph 1.2.2. The form is available herein, or on request from VIC or from the website on [www.vodacom.co.za](http://www.vodacom.co.za). The form is also available [here](#).
- The Requester must provide sufficient information for identification purposes. Therefore, proof of identity is required to authenticate the Requester such as a certified copy of their identity document, driver's license or passport.
- If the request is made on behalf of another person, the Requester must provide proof of the capacity in which they are making the request and authorisation to make such request.
- In instances where information or records pertaining to any of VIC's products (other than marketing information) is requested, the Requester must prove ownership of the product (policy) or VAS to which the requested information or records relate. The Requester may also be required to provide further particulars to prove ownership or to provide an explanation why access to the identified records is required.

A request which does not comply with the formalities contained in this Manual (including Forms not completed correctly) will be referred back to the Requester with advice on the necessary steps for compliance.

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

### 7.2 Procedure to be followed by VIC after receipt

The following procedure will be followed by VIC after receipt of the request for access:



- Once a request is made in the prescribed Form 2, VIC will send an acknowledgment of receipt.
- The Requester will receive notice from VIC to pay a request fee of R140.00 (if applicable).
- The prescribed fee must be paid before the request is processed.
- Payment of this fee should be made as directed by VIC.
- If the request is granted then the Requester 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. This includes for Personal Information requests, where applicable.

### **7.3 Guidance for completing the request Form**

The Requester can contact VIC using the details outlined in paragraph 1.2.2 for guidance on how to complete Form 2, and the documents that need to be submitted or applicable fees.

An oral request for access to a record(s) may be made as a result of the illiteracy or disability of the Requester. The Information Officer, LEA department or any designated VIC representative will assist the Requester to complete the prescribed form on behalf of such Requester and provide him/her with a copy of the completed form.

### **7.4 Response Time**

- All requests complying with the requirements set out above will be processed and a written notice of the decision provided to the Requester within 30 days after receiving the completed Form 2. In case of a request being refused, the notification will include the reasons for the refusal.
- VIC may request an extension of 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.
- VIC will make the extension request prior to the expiry of the 30-day period and provide reasons for the extension.

### **7.5 Granting or Refusal of a Request**

7.5.1 If the request for access is granted, then VIC will advise the Requester of:

- the prescribed reproduction fees for accessing the information or documentation,
- payable deposit fee and balance outstanding (if any),
- the form in which access will be given, and
- the right to lodge an application in court or complain to the Information Regulator against the access fee to be paid or the form of access to be granted, within 180 days of VIC notifying the Requester of its decision.



7.5.2 If the request for access is refused, VIC will advise the Requester about the reasons for refusal of access and may advise the Requester that they may lodge an application in court or complain the Information Regulator against the refusal of the request.

7.5.3 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; and/or
- protection of research information of a third party and of the Private Body.

7.5.4 These grounds of refusal are also endorsed in section 23(4)(a) of POPIA. If a request for access to Personal Information is made and part of that information may or must be refused in terms of PAIA, every other part will be disclosed.

## 7.6 Records that cannot be located or do not exist

Where records cannot be located but to which a Requester would have had access if the record was available, VIC will provide a response in the form of an affidavit or affirmation. This also applies where the requested records do not exist.

## 8 Prescribed Fees

The Act entitles a Private Body to levy a prescribed fee to a Requester before further Processing the request.

According to section 23(3) of POPIA, a Responsible Party may require payment of a prescribed fee for the provision of a record of Personal Information about the Data Subject in its possession. VIC will provide the Requester a written estimate of the fee before providing the services; and may require the Requester to pay a deposit for all or part of the fee.





Please see below prescribed fees applicable that have been published in the Annexure B of PAIA Regulations, 2021.

Item	Description	Amount
1	Request fee payable by every Requester	R140.00
2	Photocopy/printed black and white copy of a A4-size page	R2.00 per page or part thereof
3	Printed copy of A4-size page	R2.00 per page or part thereof
4	For a copy in a computer-readable form on flash drive (provided by Requester)	R40.00
5	For a copy in a computer-readable form on compact disc (if provided by Requester)	R40.00
6	For a copy in a computer-readable form on compact disc (if provided to the Requester)	R60.00
7	For a transcription of visual images per A4-size page	Services to be outsourced, will depend on quotation from Service Provider
8	Copy of visual images	
9	Transcription of an audio record per A4-size page	R24.00
10	For a copy of an audio record on Flash drive (to be provided by Requester)	R40.00
11	For a copy of an audio record on compact disc (if provided by Requester)	R40.00
12	For a copy of an audio record on compact disc (if provided to the Requester)	R60.00
13	To search for and prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation To not exceed a total cost of:	R 145.00  R 435.00
14	Deposit: If search exceeds 6 hours	One third of the amount per request calculated in terms of above items
15	Postage, email or any other electronic transfer	Actual expense, if any

VIC, as a private body registered under the Value Added Tax Act, 1991 will add VAT to all the above-mentioned fees

## 9 Lodgment of Complaints

The Act makes provision for the lodgment of a complaint to the Information Regulator by any person who alleges that the decision was not in compliance with the Act for refusing access, aggrieved by a decision regarding fees prescribed, the extension of the period within which the request must be dealt; or refusing access in the form requested by the



Requester. The complainant may also apply to a court with appropriate jurisdiction. The complaint to the Information Regulator must be in the prescribed manner and form as published on the website of the Information Regulator and lodged within 180 days of the decision from VIC.



## ANNEXURE A: PRESCRIBED FORM 2

### REQUEST FOR ACCESS TO RECORDS HELD BY VIC

*(Regulation 7 of the Promotion of Access to Information Act, 2 of 2000)*

#### A. Particulars of VIC

The Head: Mr. Jacques du Preez

082 Vodacom Boulevard

Vodacom Valley

Midrand

1685

or

Private bag x 9904

Sandton

2146

#### Select Type of Request

Type of Request	Where to send the request?
Request for records or description of Personal Information that VIC holds about the Requester	<a href="mailto:Lifecompliance@vodacom.co.za">Lifecompliance@vodacom.co.za</a>
Other requests of records held by VIC that do not relate to the Requester themselves	<a href="mailto:pnemolea@vodacom.co.za">pnemolea@vodacom.co.za</a>



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

- a) *The particulars of the person who requests access to the record must be completed below*  
b) *Proof of identity must be attached by the Requester*  
c) *If request is made on behalf of another person, proof of such authorisation must be attached to this form*  
d) *An affidavit as part of this form must be completed and signed where the request is made on behalf of another person*

Mark with an "X"

☐ Request is made in my own name

☐ Request is made on behalf of another person

**PERSONAL INFORMATION**

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 requested**

- 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:

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

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

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**E. 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	

**F. Form of access to record**

Mark the applicable box with an "X"



Printed copy of record <i>(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)</i>	
Written or printed transcription of virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc.)</i>	
Transcription of soundtrack <i>(written or printed document)</i>	
Copy of record on flash drive <i>(including virtual images and soundtracks)</i>	
Copy of record on compact disc drive <i>(including virtual images and soundtracks)</i>	
Copy of record saved on cloud storage server	

#### G. Manner of Access

Mark the applicable box with an "X"

Personal inspection of record at registered address of VIC <i>(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)</i> <b>Note: Call recordings will be made available to be heard at VIC's head office</b>	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed <i>format (including transcriptions)</i>	
E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language: Note: If the record is not available in the language you prefer, access may be granted in the language in which the record is available)	

#### H. 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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**I. Fees**

- |   |
|---|
| <p>a) <i>A request for access to a record, other than a record containing Personal Information about yourself, will be processed only after a <b>request fee</b> has been paid</i></p> <p>b) <i>You will be notified of the amount required to be paid as the request fee</i></p> <p>c) <i>The <b>fee payable for access</b> to a record depends on the form in which access is required and the reasonable time required to search for and prepare such record</i></p> <p>d) <i>If you qualify for exemption of the payment of any fee, please state the reason for exemption.</i></p> |
|---|

Reason for exemption from payment of fees:

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

<p><i>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.</i></p>
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How would you prefer to be informed of the decision regarding your request for access to the record? Select preference (Postal address, Fax, Electronic communication such as email)

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

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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 Requester 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 owner and/or policyholder of policy number \_\_\_\_\_. I am duly authorised to lodge this request in terms of the Promotion of Access to Information Act, No 2 of 2000.

4.

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

5.

I am the owner or policyholder of a VIC insurance or VAS product \_\_\_\_\_ 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.

6.

I hereby confirm that I have given consent to \_\_\_\_\_ request and receive information (which is more fully detailed in the document attached hereto and marked Annexure \_\_\_\_\_ which has been initialed



by me for purpose of identification) from LEA Support 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 VIC in regard to any damages that I may suffer arising from the release by LEA Support to \_\_\_\_\_ in the information referred to in Annexure \_\_\_\_\_

7.

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 Names and Surname

.....

Business Address (Street Address)

.....

.....



## ANNEXURE B: LEGISLATION IN TERMS OF WHICH RECORDS ARE KEPT

VIC 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	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")	Records of activities undertaken in order to promote economic transformation and meaningful participation of black people in the mainstream economy.
a) Companies Act No. 71 of 2008	Company documents and records, Memorandum of incorporation and records of their directors.
b) Compensation for Occupational Injuries and Health Diseases Act No. 130 of 1993	Employee record or reproduction of same relating of wages, time worked, payment for piece work and overtime
c) Consumer Protection Act No. 68 of 2008	Records of transactions aimed at promoting and protecting the economic interests of consumers.
d) 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.
e) Electronic Communications and Transactions Act No. 25 of 2002	Records of electronic transactions.
f) Employment Equity Act No. 55 of 1998	Records relating to the workforce, employment equity plans and other relevant employment related records.
g) Financial Intelligence and Centre Act No. 38 of 2001	Records necessary to establish a relationship <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>
h) Insurance Act No. 8 of 2017 (incl. the Short Term Insurance Act 53 of 1998)	Policy and Policyholder records.
i) Labour Relations Act No. 66 of 1995	Records of disciplinary transgressions against employees, actions taken and reasons for the action
j) Occupational Health and Safety Act No. 85 of 1993	Records relating to the health and safety of persons in the workplace
k) 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.



l) Prevention and Combating of Corrupt Activities Act No. 12 of 2004	Records relating to any offer of improper gratification relating to the procurement or execution of contracts or employment relationship.
m) Skills Development Act no. 97 of 1998	Records of all learnership agreements.
n) 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.
o) Unemployment Insurance Act No. 30 of 1996	Records relating to payment of contributions to the Unemployment Insurance Fund relating to: illness, maternity and for dependents.



**ANNEXURE C: RECORDS THAT ARE AUTOMATICALLY AVAILABLE TO EXISTING VIC CUSTOMERS/POLICYHOLDERS/DATA SUBJECTS**

Category of Record	Record Types	Available on our website (Vodacom.co.za)	Available on Request (outside of the procedures outlined in this Manual)
<b>Marketing</b>	Product Flyers; Product Descriptions; and/or Product Offerings;	✓	✓
<b>Customer/Policyholder</b>	Product Terms and Conditions;	✓	✓
	Personalised Cover Documents; Claim Information; Dependant Information; Benefits and VAS utilisation records; and/or Policy activation / cancellation information;		✓
<b>Company (VIC)</b>	Annual Financial Results/Statements; Career Vacancy Advertisements;	✓	✓
	Privacy Policy(ies) and Procedure(s);	✓	✓
	BBBEE Certificate(s);	✓	✓
	Financial Services Provider Licence(s) and ancillary information related thereto;		✓
	Company Structure and Information; Company Group Policies and Procedures;		✓
	Policies and Procedures Required by the Applicable Financial Services Laws and Regulations;		✓
<b>HR Records</b>	Executive Officer Details (name, employment history, qualifications and/or date of appointment);		✓
<b>Third Party(ies)</b>	Names; Appointments; and/or Licenses;		✓