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Telephone Number: 011 568 0380

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PAIA Manual for:

360 Administration and Systems (Pty) Ltd

Prepared in terms of the requirements of Section 10 of the PROMOTION OF ACCESS TO INFORMATION ACT No. 2 of 2000 (hereinafter referred to as the "Act")

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Contents:

1. Introduction:.....	3
2. Business and Contact Details:.....	4
3. Manual and Guidelines:.....	4
4. Applicable Legislation:.....	5
5. Subjects and categories of records held by 360 A&S as per Section 51 (1) (e):.....	7
6. Security Measures to protect Personal Information:.....	8
7. Categories of Records available without having to request access:.....	8
8. Request to access information / records:.....	9
9. Denial of Access:.....	9
10. Fees:.....	10
11. Protection of Personal Information:.....	11
12. Request for access to personal information:.....	11
13. Manual Availability:.....	12



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1. Introduction:

360 Administration and Systems (Pty) Ltd (360 A&S) is a private South African company that provides administration services and systems to the insurance industry in terms of member policy management.

The Promotion of Access to Information Act gives effect to the constitutional right of access to any information held by the state and any information that is held by another person and that is required for the exercise or protection of any rights.

This Promotion of Access to Information Manual ("Manual") provides an outline of the type of records and the personal information that 360 A&S holds and explains how to submit requests to 360 A&S for access to these records in terms of the Promotion of Access to Information Act 2 of 2000 ("PAIA Act").

It also explains how to ask for access, or object to, or correct personal information held by 360 A&S, in terms of paragraphs 23 and 24 of the Protection of Personal Information Act 4 of 2013 ("POPI Act").

Specifically, Section 51(1) of the Act provides that within six months after the commencement of this section (now the 31st of December 2015) or within six months after coming into existence of the private body concerned, the head of a private body must compile a manual that must contain information regarding the subjects and categories of records held by such private bodies. In this context, a "private body" is defined as any natural person who carries or has carried on any trade, business or profession, but only in such capacity or any partnership, which carries or has carried on any trade, business or profession or any former or existing juristic person (e.g. any company, close corporation or business trust).

360 A&S falls within the definition of a "private body" and this Manual has been compiled in accordance with the said provisions and to fulfil the requirements of the Act.

In terms of the Act, where a request for information is made to a body, there is an obligation to provide the information, except where the Act expressly provides that the information may not be released. In this context, Section 9 of the Act recognises that access to information can be limited. The limitation relates to circumstances where such release would pose a threat to the protection of privacy, commercial confidentiality, and the exercising of efficient governance.

Accordingly, this manual provides a reference to the records held by 360 A&S and the process that needs to be adopted to access such records.

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If you are accessing this Manual on our website, you can also get a copy from our Information Officer by writing to the address in Section 2 or emailing the Information Officer directly.

All requests to 360 A&S for access to information (other than information that is available to the public) must be addressed to the Head of the Business named in section 2 of this Manual.

2. Business and Contact Details:

Name of Business: 360 Administration and Systems (Pty) Ltd

Head of Business / Information:

Officer: Mr Stephen Sands
Position: CEO and Co-Founder

Deputy Information Officer: Ms René Kleynhans
Position: Operations Manager

Physical Address: Unit 3, Argyle Square Office Park, Tamarisk Place
Weltevredenpark
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Phone Number: +27 011 568 1018

Email Address: stephens@pol360.co.za

Website: www.pol360.co.za

3. Manual and Guidelines:

The Information Regulator, under Section 10(1) of PAIA, has updated and provided a user-friendly Guide for those exercising rights under PAIA and POPIA.

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It is accessible in all official languages and braille.

The public can review or obtain copies of the Guide during working hours at public and private body offices, including the Regulator's Office. Additionally, it's available for public inspection in two official languages.

You can also request the Guide from the Information Regulator or access it on the Regulator's website at <https://inforegulator.org.za/>.

The Information Regulator (South Africa)

Postal Address: PO Box 31533
Braamfontein
2017

Street Address: 27 Stiemens Street
Braamfontein
2001

Website: <https://inforegulator.org.za/>

POPIA complaints: POPIAComplaints@inforegulator.org.za

PAIA complaints: PAIAComplaints@inforegulator.org.za

4. Applicable Legislation:

A number of National Laws apply to 360 A&S including:

- Basic Conditions of Employment Act No. 75 of 1997.
- Collective Investments Schemes Control Act No. 45 of 2002.
- Companies Act No. 71 of 2008.
- Compensation for Occupational Injuries and Health Diseases Act No. 130 of 1993.
- Consumer Protection Act No. 68 of 2008.
- Employment Equity Act No.55 of 1998.
- Financial Advisory and Intermediary Services Act No. 37 of 2002.
- Financial Intelligence Centre Act No. 38 of 2001.
- Financial Institutions (Protection of Funds) Act No. 28 of 2001.
- Financial Services Board Act No. 97 of 1990.

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- Financial Services Ombud Schemes Act No. 37 of 2004.
- Friendly Societies Act No. 25 of 1956.
- Income Tax Act No. 58 of 1962.
- Insurance Laws Amendment Act No. 27 of 2008.
- Labour Relations Act No. 66 of 1995.
- Long-term Insurance Act No. 52 of 1998.
- Medical Schemes Act No. 131 of 1998.
- Occupational Health and Safety Act No. 85 of 1993.
- Pension Funds Act No. 24 of 1956.
- Prevention of Organised Crime Act No. 121 of 1998.
- Protection of Constitutional Democracy against Terrorist and Related Activities Act No. 33 of 2004.
- Security Services Act No. 36 of 2004.
- Short-Term Insurance Act No. 53 of 1998.
- Skills Development Act No. 97 of 1998 Skills Development Levies Act No. 9 of 1999 Unemployment Contributions Act No. 4 of 2002.
- Unemployment Insurance Act No. 63 of 2001.
- Value Added Tax Act No. 89 of 1991.

360 A&S may be required to collect, process and store information in terms of these and other laws. Some of this information will be “personal information” as this is defined in POPIA. 360 A&S has published a Privacy Notice on its website www.pol360.co.za for ease of information and understanding of compliance with the Protection of Personal Information Act.

360 A&S will only process personal information as required by POPIA. We also call the information that we keep “records”. Subjects and categories of these records are described in the Privacy Notice mentioned in the previous paragraph.

360 A&S has a POPIA Policy and Procedure which can be accessed on request. If personal information is going to be processed by 360 A&S, we will do so lawfully and in a reasonable manner that does not infringe on the privacy of the data subject.

360 A&S has appointed an Information Officer and a Deputy Information Officer who are employees within the organisation, to encourage and ensure compliance, accountability and responsibility in terms of relevant legislation.

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5. Subjects and Categories of Records Held by 360 A&S as per Section 51 (1) (e):

Companies Act 71 of 2008 Records:

- Documents of Incorporation.
- Records relating to the appointment of directors / auditors / secretary / public officer and other officers.
- Share Register and other Statutory Registers.
- Authorised Financial Service Provider Records.

Financial and Admin Records:

- Minutes of management meetings.
- Minutes of staff meetings.
- Correspondence.
- Assets Inventory.
- Annual Financial Statements.
- Annual Tax Returns.
- Accounting Records.
- Bank Statements.
- Invoices Income Tax Records.
- PAYE Records.
- Documents issued to employees for Income Tax Purposes.
- Records of payment made to SARS on behalf of employees.
- VAT Records.
- Skills Development Levies.
- UIF.
- Workman's Compensation.

Human Resource Records:

- Employment Contracts.
- Disciplinary Records.
- Salary Records.
- Leave Records.
- Training Records.

Operations:

- FAIS Compliance Manual.
- Contractual Agreements with suppliers.
- Client Service Agreements.



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- Policy Holder Applications and Policy Documentation required by the Insurance Provider.
- Register of Brokers / Agents.
- Broker / Agent Agreements.

6. Security Measures to Protect Personal Information:

Through regular risk assessment, we are able to identify security measures necessary to secure the confidentiality and integrity of processing of personal information.

Examples of some of our Technical Security measures are as follows:

- Encrypted storage and transfer.
- Employee access controls.
- Regular updating of security software and systems.
- Monitoring to detect potential breaches.

Examples of some of our Organisational security measures are as follows:

- Employee awareness and training on relevant policies and procedures.
- Undertaking Data Protection Impact Assessments.
- A documented disaster recovery program, including regularly tested backups.
- Limiting employee access to personal data.
- We maintain a risk management program to address information security risks and breaches.

7. Categories of Records Available Without Having to Request Access:

The 360 A&S website, www.pol360.co.za is accessible to anyone with access to the internet and contains the following:

Category of Records	Types of Record	Available on Website
Corporate Information	About 360 A&S	X
Product Information	Systems and Services	X
Contact Information	Address, Email and Phone Number	X
Legal Information and Documents	Site usage terms and conditions, PAIA, Privacy Policy, Conflict of Interest Policy, etc.	X

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8. Request to Access Information / Records:

In order to request access to a record the requester must:

- Use the prescribed form, see Addendum 1, to make the request for access to a record. Request forms are available from our offices or at www.pol360.co.za.
- Address the request to the Head of Business named in Section 2 above.
- This request must be made to the address, fax number or electronic mail address of the business.
- Provide sufficient detail on the request form to enable the Head of Business to identify the record and the requester.
- Indicate which form of access is required.
- Indicate what form of communication the Company should use to inform the requester and furnish the necessary particulars to ensure accurate and timeous communication.
- The requester must identify the right that is sought to be exercised or to be protected and must provide an explanation of why the requested record is required for the exercise or protection of that right.
- If a request is made on behalf of another person, the requester must submit proof of the capacity in which the requester is making the request to the satisfaction of Head of Business
- The prescribed request fee must be attached in relation to request for access to information.

We will respond to your request within 30 days of receiving the request by indicating whether your request for access has been granted or denied. Please note that the successful completion and submission of a request for access form does not automatically allow the requestor access to the requested record.

Access will be granted to a record only if the following criteria are fulfilled:

- The record is required for the exercise or protection of any right; and
- The requestor complies with the procedural requirements set out in the Act relating to a request; and
- Access to the record is not refused in terms of any ground for refusal as contemplated in Chapter 4 of Part 3 of the Act.

9. Denial of Access:

Access to any record may be refused under certain limited circumstances. These include:

- The protection of personal information from unreasonable disclosure concerning any natural person.
- The protection of commercial information held concerning any third party (for example trade secrets).

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- The protection of financial, commercial, scientific or technical information that may harm the commercial or financial interest of 360 A&S or any third party.
- Disclosures that would result in a breach of a duty of confidence owed to a third party.
- Disclosures that would jeopardize the safety or life of an individual.
- Disclosures that would prejudice or impair the security of property or means of transport.
- Disclosures that would prejudice or impair the protection of a person in accordance with a witness protection scheme.
- Disclosures that would prejudice or impair the protection of the safety of the public.
- Disclosures that are privileged from production in legal proceedings unless the privilege has been waived.
- Disclosures of details of any computer programme.
- Disclosures that will put 360 A&S at a disadvantage in contractual or other negotiations or prejudice it in commercial competition.
- Disclosures of any record containing any trade secrets, financial, commercial, scientific, or technical information that would harm the commercial or financial interest of 360 A&S.
- Disclosures of any record containing information about research and development being carried out or about to be carried out by 360 A&S.

If access to a record or any other relevant information is denied, our response will include:

- Adequate reasons for the refusal; and
- Notice that you may lodge an application with the court against the refusal and the procedure including details of the period for lodging the application.

10. Fees:

The applicable fees are prescribed in terms of the Regulations promulgated under the Act. There are two basic types of fees payable in terms of the Act.

Request Fee:

The non-refundable request fee of R 50 (excluding VAT) is payable on submission of any request for access to any record. However, if the record you ask for takes more than 1 hour to prepare, you will also have to pay an additional fee of R100.00 per hour.

This does not apply if the request is for personal records of the requestor. No fee is payable in such circumstances.

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Access Fee:

The access fee is payable prior to being permitted access to the records in the required form. The applicable fees are prescribed in terms of Part III of Annexure A as identified in Government Notice Number 187, Regulation 11.

11. Protection of Personal Information:

360 A&S's mission is to strive to maintain the highest level of care and diligence to ensure compliance with the Protection of Personal Information Act 4 of 2013.

The company's Privacy Notice is published on our website: www.pol360.co.za

By acting as a custodian and collator of personal information, 360 A&S shall apply all applicable laws and legislation in a consistent manner to ensure that personal information be processed lawfully and in a reasonable manner; that does not infringe on the privacy of the data subject.

360 A&S has appointed an Information Officer, and a Deputy Information Officer who are employees within the organisation, to encourage and ensure compliance, accountability and responsibility in terms of relevant legislation.

The Information Officer will continuously strive to stay updated on all legislative updates and educate all new and current employees accordingly. Furthermore, the Information Officer will regularly audit the safety and integrity of data stored and processed.

12. Request for access to personal information:

Section 22 of the Protection of Personal Information Act, states that a person to whom the personal information is related, may request a responsible party to confirm that they are holding personal information about the person (data subject) and may obtain a description of the information and details about who has had access to it. Where such a request is received, the matter must be referred to the Information Officer who will ensure that the correct procedures are adopted. Section 23 of the Protection of Personal Information Act, provides for a right to request correction of personal information held by a responsible party if it is inaccurate, incomplete, misleading, out of date, and obtained unlawfully, irrelevant or excessive. Where such a request is received, the matter must be referred to the Information Officer who will ensure that the correct procedures are adopted.

To request access to records held by 360 A&S under section 50 of PAIA, you must use the prescribed form outlined in the Regulations for Access to Information. Refer to Addendum 1 of this manual for

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an image of this form. Submit the request to 360 A &S at the provided address, fax number, or email address provided herein.

Requesters must furnish adequate details on the form to identify the requested records and the requester's identity. If making a request on behalf of another party, provide satisfactory proof of your authority. Specify the desired access method and include contact details within South Africa.

Clearly state the right you seek to exercise and explain why the requested record is necessary for that purpose. 360 A&S must respond to your request in writing and follow any additional communication preferences you specify in your request.

If the requested record exists and does not affect a third party, it will be processed within 30 days. Extensions may occur for specific reasons, provided you consent in writing.

13. Manual Availability:

This Manual is available at the offices of the Information Regulator. The Manual is also available at www.pol360.co.za. Copies may also be obtained from the Information Officer of 360 A&S.

In respect of hard copies, any transmission or postage will be for the account of the requester.

A handwritten signature in black ink, appearing to read 'Stephen Sands', written over a horizontal line.

Stephen Sands
CEO and Co-Founder

6 May 2025

Date