

**TALKSURE (PTY) LTD T/A COMPARE &
SAVE**

PAIA MANUAL

**Prepared in terms of section 51 of the
Promotion of Access to Information Act 2
of 2000 ("PAIA") (as amended) and in terms
of the Protection of Personal Information
Act of 2013 ("POPIA")**

DATE OF REVISION: 22/08/2023

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1. LIST OF ACRONYMS AND ABBREVIATIONS

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|-----|-------------|--|
| 1.1 | "CEO" | Chief Executive Officer |
| 1.2 | "DIO" | Deputy Information Officer; |
| 1.3 | "IO" | Information Officer; |
| 1.4 | "Minister" | Minister of Justice and Correctional Services; |
| 1.5 | "PAIA" | Promotion of Access to Information Act No. 2 of 2000(as Amended); |
| 1.6 | "POPIA" | Protection of Personal Information Act No.4 of 2013; |
| 1.7 | "Regulator" | Information Regulator; and |
| 1.8 | "Republic" | Republic of South Africa |

2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

- 2.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 2.2 have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- 2.3 know the description of the records of the body which are available in accordance with any other legislation;

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- 2.4 access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;
- 2.5 know the description of the Guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 2.6 know if the body will process personal information, the purpose of the processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 2.9 know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- 2.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF TALKSURE (PTY) LTD T/A COMPARE & SAVE

3.1. Chief Executive Officer

Name: SUNJVEER PANDAY
Tel: 031 582 8366
Email: Client.services@talksuresa.co.za

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3.2. Access to general information contacts

Email: Client.Services@Talksuresa.co.za

3.3 Head Office

Postal Address: P.O Box 1498
Umhlanga Rocks
4319

Physical Address: 62 Umhlanga Ridge Boulevard
Parkside
Umhlanga
4051

Telephone: 0860 33 33 43

E-mail: Client.Services@Talksuresa.co.za

Website: www.talksure.co.za

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

4.1. The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA ("Guide"), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.

4.2. The Guide is available in each of the official languages and in braille.

4.3. The aforesaid Guide contains the description of-

4.3.1. the objects of PAIA and POPIA;

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- 4.3.2. the postal and street address, phone and fax number and, if available, electronic mail address of-
 - 4.3.2.1. the Information Officer of every public body, and
 - 4.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²;
- 4.3.3. the manner and form of a request for-
 - 4.3.3.1. access to a record of a public body contemplated in section 11³; and
 - 4.3.3.2. access to a record of a private body contemplated in section 50⁴;
- 4.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;
- 4.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;
- 4.3.6. all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging-
 - 4.3.6.1. an internal appeal;

¹ Section 17(1) of PAIA- *For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.*

² Section 56(a) of POPIA- *Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.*

³ Section 11(1) of PAIA- *A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

⁴ Section 50(1) of PAIA- *A requester must be given access to any record of a private body if-*

- a) *that record is required for the exercise or protection of any rights;*
- b) *that person complies with the procedural requirements in PAIA relating to a request for access to that record; and*
- c) *access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

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- 4.3.6.2. a complaint to the Regulator; and
- 4.3.6.3. an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;
- 4.3.7. the provisions of sections 14⁵ and 51⁶ requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- 4.3.8. the provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 4.3.9. the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
- 4.3.10. the regulations made in terms of section 92¹¹.

⁵ Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

⁶ Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.

⁷ Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access

⁸ Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access

⁹ Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹⁰ Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹¹ Section 92(1) of PAIA provides that –“The Minister may, by notice in the Gazette, make regulations regarding-

- (a) any matter which is required or permitted by this Act to be prescribed;
- (b) any matter relating to the fees contemplated in sections 22 and 54;
- (c) any notice required by this Act;
- (d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and
- (e) any administrative or procedural matter necessary to give effect to the provisions of this Act.”

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4.4. Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.

4.5. The Guide can also be obtained-

4.5.1. upon request to the Information Officer;

4.5.2. from the website of the Regulator (<https://info regulator.org.za/>).

4.5.3. by e-mailing a request to the Regulator, E-mail: info reg@justice.gov.za

4.6 A copy of the Guide is also available in two official languages for public inspection during normal office hours-

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

Information is required by section 51 (1) (c) of the Act.

A section 52(2) notice regarding categories of records, which are available without a person having to request access in terms of the Act, has to date not been published.

6. DESCRIPTION OF THE RECORDS OF TALKSURE WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Category of Records	
Statutory company information	Taxation a. Copies of all Income Tax Returns and other tax returns and documents
Short-term and long-term insurance products	Acquisition or disposal documentation
Annual Financial Statements including; a. Annual accounts b. Director's reports	Contracts and agreements a. Supplier and revenue contracts b. Client contracts/policy packs.

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Category of Records	
c. Auditors reports	
Books of account regarding information required by the Companies Acts	Client information
Accounting records a. Books of accounts including journals and ledgers	Marketing
Information technology	Human Resources
PAIA Manual	All records kept in terms of the Company Laws of South Africa
	Customer satisfaction/Product management

Applicable legislation	
Electronic Communications and Transactions Act, 2002	Conversion of SASRIA Act, 1998
Income Tax Act, 1962	Insider Trading Act, 1998
National Credit Act, 2005	Short Term Insurance Act, 1998
Stamp Duties Act, 1968 (repealed)	Statistics Act, 1999
Value-Added Tax Act, 1991	Basic Conditions of Employment Act, 1997
Tobacco Products Control Act, 1993	Compensation for Occupational Injuries and Diseases Act
Employment Equity Act, 1998	Labour Relations Act, 1995
Occupational Health and Safety Act, 1993	Manpower Training Act, 1981 (repealed)
Skills Development Act, 1998	Skills Development Levies Act, 1999
Unemployment Insurance Act, 2001	Unemployment Insurance Contributions Act, 2002
Regional Services Councils Act, 1985	Broad Based Black Economic Empowerment Act, 2003
Companies Act, 1973	Companies Act, 2008
Competition Act, 1998	Consumer Affairs Act (Unfair Business Practices) Act, 1988
Consumer Protection Act, 2008	Consumer Affairs Reports
Copyright Act, 1978	Trademarks Act, 1993
Long Term Insurance Act, 1998	Medical Schemes Act, 1998

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Applicable legislation	
Financial Advisory and Intermediary Services Act, 2002	Financial Intelligence Centre Act, 2001

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

Subjects on which the body holds records	Categories of records
Strategic Documents, Plans, Proposals	Annual Reports, Strategic Plan, Annual Performance Plan.
Human Resources	<ul style="list-style-type: none"> • HR policies and procedures • Advertised posts • Employees records • Recruitment checklists (consent forms and employment checks. • Training and skills
Statutory company information	<ul style="list-style-type: none"> • Certificate of incorporation; • Certificates of Change of Name (if any); • Memorandum and Articles of Association; • Minute book, CM25 and CM26, as well as Resolutions passed at general meetings; COR forms • Proxy forms • Register of Shareholders; • Register of Director's shareholdings; • - Register of Directors and Certain Officers
Annual Financial Statements and ancillary information.	<ul style="list-style-type: none"> • Annual accounts • Director's reports • Auditors reports • Books of account regarding information required by the Companies Acts 71, • 2008; • Supporting schedules of books of account and ancillary books of accounts;

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Subjects on which the body holds records	Categories of records
	<ul style="list-style-type: none"> • Accounting records • Books of accounts including journals and ledgers • Taxation • - Copies of all Income Tax Returns and other tax returns and documents
Agreements and Contracts	<ul style="list-style-type: none"> • Revenue • Supplier • - Client contracts

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

Purpose of processing personal information	
Application for Employment	Legal Proceedings
Claim Checks (administration only)	Market Research & Statistical Analysis
Claims Management	Marketing
Compliance Assessment	Operations
Compliance with Legislation	PI Maintenance
Credit Reference Checking	Provision of Products & Services
Collections, defaults and retentions processing	Record Keeping
Employment Management & Administration	Social Responsibility
Fraud, Crime & Money Laundering Detection	Identification Verification
Procurement processes	

8.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

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Categories of Data Subjects	Personal Information that may be processed
Customers / Clients	Name, address, registration numbers or identity numbers, employment status and bank details
Service Providers	Names, registration number, vat numbers, address, trade secrets and bank details, identity numbers, credit information
Employees	Address, qualifications, gender and race, identity numbers, and address. Credit information, criminal checks

8.3 The recipients or categories of recipients to whom the personal information may be supplied

We sometimes wish to share the personal information we process with the individual themselves and also with other organisations within our group. Where this is necessary, we are required to comply with all aspects of the Protection of Personal Information Act. What follows is a description of the types of organisations we may choose to share some of the personal information we process with for one or more reasons. Where necessary or required, we share information with.

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Identity numbers and names for criminal checks.	South African Police Services
Qualifications, for qualification verifications.	South African Qualifications Authority
Credit and payment history for credit information	Credit Bureaus
Client information	Group entities performing functions to provide services and/or market products.
Client information	Service providers, Underwriting managers and Insurers

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Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Client information	Directly to the client and/or family member were permitted or consented to.

8.4 Planned transborder flows of personal information

We will only transfer your personal information across South African borders if the relevant situation requires trans-border processing and storage. We will do so only in accordance with South African legislative requirements. Accordingly, you consent to transferring your personal information to third parties in foreign countries, where required. We will take steps to ensure that such third parties are bound by laws, binding corporate rules or binding agreements that provide an adequate level of protection and uphold principles for reasonable and lawful processing of personal information.

8.5 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information

We make use of reputable service providers to ensure that care is taken to protect your information and also that we can restore the data should there be a technical problem. Client information is kept on our CRM tool and a cloud-based server.

If you give us information on behalf of someone else, you confirm to us that you have their permission to do so and that they are aware of the contents of this Privacy Policy and do not have any objection to our processing their information in accordance with this Privacy Statement.

We endeavour to keep our website secure at all times. However, we advise you that we cannot guarantee the security of any information provided to us or by us through our website, e-mail, internet or social media. We cannot be held responsible for any loss or unauthorised use or interception of information transmitted via the internet which is beyond our control. Our website may contain links to other websites outside of Talksure. We are not responsible for other websites' content, privacy or security.

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We use social plugins of social networks, including but not limited to plugins such as Facebook, YouTube, LinkedIn, Google+ and Twitter.

Please note that we have no influence on or control over the extent of the data retrieved by the social networks' interfaces, and we can accordingly not be held responsible or liable for any processing or use of personal information transmitted via these social plugins. For information on the purpose and extent of the data retrieval by the social network concerned, and about the rights and settings possibilities for protecting your private sphere, please refer to the data protection information provided by the social network in question.

9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

9.1.1 on www.talksuresa.co.za, if any;

9.1.2 head office of Talksure for public inspection during normal business hours;

9.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and

9.1.4 to the Information Regulator upon request.

9.2 A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

10. UPDATING OF THE MANUAL

Talksure will, on a regular basis, update this Manual via its Policy Management Committee. Updates will be published on our website.

Issued by

Sunjveer Panday

(Chief Executive Officer)